

# Exhibit A

*United States v. Sabrina Canale*

22 CR 633

Complaint, ECF No. 10

**FILED**

12/7/2022

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SABRINA CANALE

CASE NUMBER: 22CR633

UNDER SEAL**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Between in or about November 2021, until in or about October 2022, at Hanover Park, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

*Code Section*Title 18, United States Code, Section  
2261A(2)(B)*Offense Description*

With the intent to harass and intimidate another person, used an interactive computer service and electronic communication service or electronic communication system of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotions distress to a person

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

*Nina D. Miller* w/p TPP

NINA D. MILLER

Special Agent, Federal Bureau of Investigation  
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: December 7, 2022

*Sheila Finnegan*  
Judge's signature

City and state: Chicago, Illinois

SHEILA M. FINNEGAN, U.S. Magistrate Judge  
Printed name and title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, NINA D. MILLER, being duly sworn, state as follows:

**I. INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately August 2020. Before August 2020, I worked with the FBI as a personnel security specialist. As part of my duties as an FBI Special Agent, I have investigated criminal violations relating to violent crimes, narcotic offenses, firearms offenses, and threat-related offenses. I have been involved in the execution of multiple arrest and search warrants.

2. This affidavit is submitted in support of: (1) a criminal complaint alleging that SABRINA CANALE has, with the intent to harass and intimidate another person, used an interactive computer service and electronic communication service or electronic communication system of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, in violation of Title 18, United States Code, Section 2261A (the “**Subject Offense**”); and (2) a search warrant for the cellular telephone device that has used phone numbers 224-XXX-5805 and 630-XXX-8186, with IMSI 311480759418334, described further in Attachment A (“**CANALE Phone 5**”), concerning evidence and instrumentalities of the **Subject Offense**.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CANALE with a violation of Title 18, United States Code, Section 2261A and securing the above-mentioned search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth the facts that I believe establish probable cause to believe that the defendant committed the offense alleged in the complaint. Indeed, in this case, given the nature of the offenses involved and the fact they involve daily or weekly harassment or threats, 911 calls, and blocked number calls, this affidavit does not encompass everything learned during this investigation, everything currently under investigation, or recent developments.

4. This affidavit is based: on my personal knowledge, training, and experience; information I have received from other law-enforcement personnel, including the local law-enforcement agencies and forensic specialists discussed below; my review of certain electronic evidence and law-enforcement reports; my review of consensually made recordings and surveillance footage; my review of records received from various electronic service providers; and information provided by persons with knowledge regarding relevant facts.

5. This affidavit begins by explaining the background on certain service providers relevant to this case, including texting applications and cellular devices, before summarizing and explaining the evidence establishing probable cause that CANALE has violated Title 18, United States Code, Section 2261A and that evidence and instrumentalities will be found in **CANALE Phone 5**.



## II. BACKGROUND ON TEXTING APPLICATIONS AND CELLULAR PHONES

6. Based on my experience and publicly available sources, including texting applications' websites, I have learned the following about texting mobile applications:

a. The texting applications discussed in this affidavit develop and offer to the public mobile applications for Apple iOS and Android users. Users download the applications on their devices and input their user information. Based on my experience in this investigation, certain texting applications require user verification (through text message or email, for example); but many of the texting applications do not require user verification before the user's account becomes accessible. Through the application, depending on the Service Provider, users can send multimedia messages (such as "Short Message Service" ("SMS") or "Multimedia Messaging Service" ("MMS") messages) or make phone calls through WiFi or broadband cellular technology (such as 3G, 4G, 5G, or LTE).

b. The texting applications assign users telephone numbers. Typically, users may select a geographic region so as to receive a particular local area code or set of codes. Based on my experience and according to publicly available sources, users are assigned the numbers on a temporary basis. Depending on the Service Provider, the numbers may expire for the user after a certain period of inactivity or after a particular timeframe. For example, according to the publicly available information, Burner permits a seven-day free trial; Pinger users' numbers are recycled after 30 days of inactivity; TextPlus's numbers are reclaimed after seven

days of inactivity; TextNow recommends users use the number at least once every two days to prevent expiration; and TextMe will not reassign a number so long as it is used at least once every two weeks. These periods are only examples, and the length of the number's availability may depend on, among other factors, the specific service for which the user pays or otherwise uses. While the texting applications charge users for certain functionalities—like voicemail, voicemail transcription, or prolonged service—they generally permit text functionality from temporary numbers free of charge or for a relatively small charge.

c. Based on my experience and according to records received from the texting applications, stored electronic communications, including retrieved and unretrieved voicemail, text messages, and multimedia messages, may be located on the computers of the texting applications. I am aware that computers located at or controlled by the texting applications contain information and other stored electronic communications belonging to unrelated third parties.

d. Further, the texting applications retain user and content information for their assigned numbers. This may include, among other information, subscriber information, the contents of voicemails, texts, multimedia messages, IP addresses, call or messaging logs, and communications or correspondence with users, including regarding user verification, technical problems, complaints, or billing inquiries.

e. Based on company websites and records, none of the texting applications discussed herein—including Burner, TextNow, TextMe, Ooma, and

Dington—are located in the state of Illinois. Each is a mobile application, which requires data or Internet connection to operate.

7. Based on my experience, the experience of other law enforcement officers with whom I have consulted, and publicly available sources, I have learned the following about cellular devices:

a. Based on my training and experience and the training and experience of other law enforcement officers, evidence relating to criminal conduct is often found on electronic storage devices, including cell phones, laptops, and tablets. Based on the nature of the criminal violations and on my training and experience, evidence relating to the criminal violations can be located in a subject's cell phone including applications downloaded, message logs with messages relating to the violations or co-conspirators, call logs revealing commonly called contacts, images of conversations or images relating to those sent to the Individuals noted above, and more.

b. The memory of a cell phone often contains records of access to applications, even those no longer downloaded onto the cell phone, email accounts, contacts, call logs, nicknames used, and other information which can assist in linking the user of the phone to other facilities, storage media, services, and phone numbers – such as email addresses and Internet Protocol (IP) addresses – that may contain information or data concerning the Subject Offenses.

c. Cell phones can reveal the geographic location of the phone and its user at a particular time, including GPS coordinates and location information

integrated into an image or video sent via email or text message to include both metadata and the physical location displayed in an image or video. Such information can be used to link the user of a cell phone to locations and events relevant to the investigation.

d. Finally, the memory of a cell phone commonly contains information such as contact lists, logs, and communications and associated date/time data which tends to reveal the identities and locations of the user of, or person(s) with control over or access to the cell phone and the telephone number associated with the phone.

### III. FACTS SUPPORTING PROBABLE CAUSE

8. As detailed below, the FBI is investigating the **Subject Offense**: a series of threatening, harassing, and stalking communications made to multiple individuals over approximately the last year. These messages, as shown below, involve threats to life, claims of surreptitious surveillance including in the victims' homes, and name-calling and other derogatory statements. Many of the threats and stalking communications have come from telephone numbers assigned to applications that allow users to, among other things, send text messages from telephone numbers that are not assigned to them by their cellular carrier. These applications temporarily assign these numbers to users. In addition, the investigation involves false 911 calls, unwanted food-order deliveries, fictitious social-media accounts, and other forms of harassment, as well as false and material statements made to investigators.

9. As detailed below, the investigation shows that SABRINA CANALE has committed the **Subject Offense**. Specifically, certain of the numbers used to send threats come back to usernames or phones known to be used by CANALE. In other instances, the numbers were registered by phones and IP-address providers known to be used by CANALE. In addition, other evidence—including blocked calls from certain of the CANALE Phones (defined below), certain of the CANALE Phones’ frequent uses of the telephone applications, repeated false 911 calls associated with CANALE Phone 4 and **CANALE Phone 5**, and other evidence—indicates further that CANALE has committed **Subject Offense**. Indeed, to take a recent example, in October 2022, the FBI obtained video recordings appearing to show CANALE dialing 911 and hanging up from her place of employment, causing an unnecessary law-enforcement response and consistent with the **Subject Offense**.

**A. BACKGROUND AND RELATIONSHIPS**

10. The FBI’s investigation concerns several individuals, some of whom are identified and whose relationships are described below. The list below does not identify each person who has received threatening or stalking communications.

a. SABRINA CANALE is a 22-year-old woman, who, according to Illinois state records, local police reports, and an interview of Individual A, CANALE’s family member, and other information, resides in Hanover Park, Illinois. As to the cellular devices she has used during this investigation:

i. According to a consent search of CANALE’s cell phone and T-Mobile Records, CANALE used the telephone number 630-XXX-1851 (“CANALE

Phone 1”)<sup>1</sup> until approximately September 2021. Around that time, according to T-Mobile Records and a Hanover Park Police Department (“HPPD”) report, CANALE obtained a new telephone number with the number 630-XXX-2110 (“CANALE Phone 2”).<sup>2</sup> According to an interview with Individual A, by January 21, 2022, CANALE was again using CANALE Phone 1.

ii. According to Individual A’s interview on February 11, 2022, CANALE began using a new device with telephone number 602-XXX-1103 (“CANALE Phone 3”)<sup>3</sup> on or about February 9, 2022. According to a local police report and an interview of Individual A on or about April 5, 2022, CANALE began using a new device with the same telephone number 602-XXX-1103 (“CANALE Phone 4”)<sup>4</sup> shortly after March 28, 2022 (“CANALE Phones”). Both CANALE Phone 1 and CANALE Phone 2 are registered with T-Mobile to Individual A. Both CANALE Phone 3 and CANALE Phone 4 are registered with AT&T to a prepaid customer.<sup>5</sup>

iii. According to a DuPage County Sheriff’s Office (“DCSO”) report taken on or about October 12, 2022, CANALE was using a device with telephone number 224-XXX-5805. According to a local police report taken on or about October 19, 2022, CANALE was using a device with telephone number 630-XXX-

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<sup>1</sup> According to records from T-Mobile, the IMSI is 310260274766295.

<sup>2</sup> According to records from T-Mobile, the IMSI is 310260292999307.

<sup>3</sup> According to records from AT&T, the IMSI is 310410364417007

<sup>4</sup> According to records from AT&T, the IMSI is 310410364417007

<sup>5</sup> According to an April 19, 2022 interview of CANALE, CANALE purchased a “flip-phone.” CANALE did not provide a phone number for that phone and stated she had not purchased a SIM card.



8186. Records received from Tracfone indicate that these two numbers operated on the same device, with IMSI 311480759418334. Specifically, Tracfone records indicate that the “Phone was activated” with the number ending 5805 on September 5, 2022, and “then changed to” the number ending in 8186 on October 15, 2022. These numbers are registered to Tracfone through Verizon, and Verizon’s records indicate that the IMSI device is operated on an Alcatel A600DL Android device.<sup>6</sup>

b. Individual A is a 54-year-old woman, who, as noted, is CANALE’s family member.

c. Individual B is a 47-year-old woman and the mother of Individual C. Based on reports from the HPPD, as well as interviews of Individual A and Individual B, Individual A and Individual B are friends.

d. Individual C is a 21-year-old woman and is Individual B’s daughter. Based on HPPD reports, photographs, and text messages obtained by consent searches of mobile telephones, CANALE and Individual C are friends.

e. Individual D<sup>7</sup> is a 49-year-old woman and is the mother of Individual E (described below).

f. Individual E is an 18-year-old woman. For the majority of this investigation, Individual E was a 17-year-old minor.

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<sup>6</sup> **CANALE Phone 5** has used both numbers ending in 5805 and 8186 during this investigation. **CANALE Phone 5** will be described in more particularity below by adding the number in parenthesis (i.e., “**CANALE Phone 5** (5805)” and “**CANALE Phone 5** (8186)”).

<sup>7</sup> Individual D has a criminal history of four charges of assault with zero convictions, and one charge of obstructing arrest with zero convictions.

g. Individual F is a 21-year-old woman. According to Carol Stream Police Department reports, Individual F is a friend of CANALE and Individual C.

h. Individual G is an 82-year-old woman and a relative of Individual A and CANALE.

i. Individual H is a 26-year-old man and is in a relationship with CANALE.

11. As background, the FBI's investigation began in the fall of 2021. On or about October 26, 2021, Individual A submitted a complaint to the FBI alleging ongoing harassing communications sent to her cellphone. On or about November 12, 2021, the FBI met with members of the HPPD and DCSO regarding their ongoing threat investigations concerning the above-referenced certain of the Individuals and CANALE. The FBI later met with and interviewed Individuals A, B, C, D, E, and CANALE and has continued to be in contact with local law enforcement regarding the threats and cyberstalking.

12. Based on local law enforcement reports and witness interviews, beginning in or about August 2021, CANALE, Individual C, Individual E, and Individual F began reporting receiving harassing text messages from unknown numbers. Following a trip to Florida in June 2021 (which, among others, included CANALE, Individual C, and Individual E), CANALE, Individual C, and Individual E, among others, claimed to have begun receiving escalating harassing communications from unknown numbers. Since then, Individual A and Individual B have reported, among other things: they believe their home-security systems, personal devices, and

cloud accounts have been hacked, in part because the person sending the messages has referenced where individuals in their homes are located; they and others, including CANALE, have been followed while driving; Individual G has been the target of harassment and threats, as have many others known and currently unknown to the FBI; food deliveries have been made to their homes without their requests; and false 911 calls (which create unnecessary law-enforcement responses) and blocked calls have been made to them. Individual D has also reported harassing messages received by Individual D's husband and Individual E, as well as food deliveries made to Individual D's home without Individual D's request. Individual D has also reported seeing CANALE outside of Individual D's home.

13. The threatening, stalking, and harassing messages and calls, according to information gathered to date and reports from the Individuals, are frequent (there have been at least 2,800, and likely far more, to various Individuals), and they have caused substantial emotional distress on the recipients of the messages. As a result of the threatening and harassing messages, the receiving Individuals have taken many actions to avoid them, including purchasing new telephones and removing devices from their homes, among other things, according to reports from certain Individuals.

14. More specifically, according to an interview of Individual C on October 27, 2022, Individual C lost their job and income due to their employer receiving

harassing and threatening phone calls.<sup>8</sup> Individual C believes Individual B and Individual C have purchased at least 30 cell phones collectively in attempts to stop the threatening and harassing messages. Individual C also believes Individual B and Individual A spent approximately \$7,000 each to hire a private investigator in 2021 due to the threats. Individual C stated that due to the harassment and threats Individual C is stressed, embarrassed, and afraid to talk to friends. Likewise, according to an interview of Individual B on November 17, 2022, Individual B stated Individual B has spent approximately \$25,000 related to the ongoing harassment, including expenses related to new devices, lawyers, and investigators.

15. As described below, CANALE has sent threatening and stalking communications to at least Individuals A, B, C, D, and H, as well as herself. Threatening messages were sent from at least 15 text-messaging accounts registered to CANALE's email addresses or cell phones; at least 15 other subject text-messaging accounts used to send messages were opened using her residence's IP address. Multiple false 911 calls and blocked calls to Individuals were made from her cell phones. And at least two Facebook profiles used to harass Individuals were verified to CANALE's cell phones. Despite claims by CANALE that her devices have been hacked, the Regional Forensics Computer Laboratory ("RCFL") found no malware during searches of her four cell phones.<sup>9</sup> Moreover, based on my training and

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<sup>8</sup> A laptop assigned to Individual C by her former employer was given to the FBI for a consent search. The analysis of the laptop is not yet complete.

<sup>9</sup> Specifically, based on my discussions with the RCFL and the examiner notes, CANALE's four devices (CANALE Phones 1, 3, and 4, and one additional phone used by CANALE) were

experience, and based on information I have received from experts within the FBI, it is highly unlikely that the wrongdoer in this investigation has the motive or technical sophistication to hack the phones (and other devices, as Individuals have alleged) as would be required so as to make it appear as though they have sent the criminal messages in the ways described below.<sup>10</sup> CANALE's motive for harassing her own relatives, friend, her friend's family, and indeed herself is, at this stage, difficult to discern. But the evidence described below establishes that CANALE has committed the **Subject Offense**.

**B. THREATENING AND HARASSING MESSAGES CONNECTED TO CANALE**

16. As described below, certain of the threatening and harassing messages identified during this investigation are connected to devices or accounts operated by CANALE. These include: (1) subject numbers registered to CANALE's devices or accounts; or (2) subject numbers opened through IP addresses used at CANALE's residence.

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extracted and opened in Cellebrite Physical Analyzer. Each respective RCFL examiner, among other things, employed a malware scanner with no malware found on any of the four phones seized from CANALE.

<sup>10</sup> As described further in Section III.C.6. below, Individual A, Individual B, and Individual C have reported to the FBI that they believe Individual D, Individual E, and/or others affiliated with Individual D and Individual E are sending the threats and stalking communications.

**1. Subject Numbers Connected to CANALE Devices or Accounts**

**a. Subject Number 630-XXX-3987**

17. According to local police reports, on or about November 8, 2021, beginning at approximately 8:47 p.m.,<sup>11</sup> Individual A began receiving threatening and stalking messages on her cell phone from number 630-XXX-3987. These messages, among other things, stated, “My guys are by ur moms :),” a reference to Individual G; commented on the fact that Individual G’s television was on and, later, police were at her home; and repeatedly called Individual A a “pussy.” Images of the messages are below.<sup>12</sup>

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<sup>11</sup> Times in this affidavit are listed in Central Time.

<sup>12</sup> The sequence of each subset of images in this affidavit are based on timestamps in images and/or order of receipt from Individuals. In each case, they do not necessarily reflect the true chronological order in which the messages were received. In addition, throughout this affidavit, I have redacted the first or full names of individuals in the images of text messages; in the margins, I have identified the individuals referenced by the monikers used above.





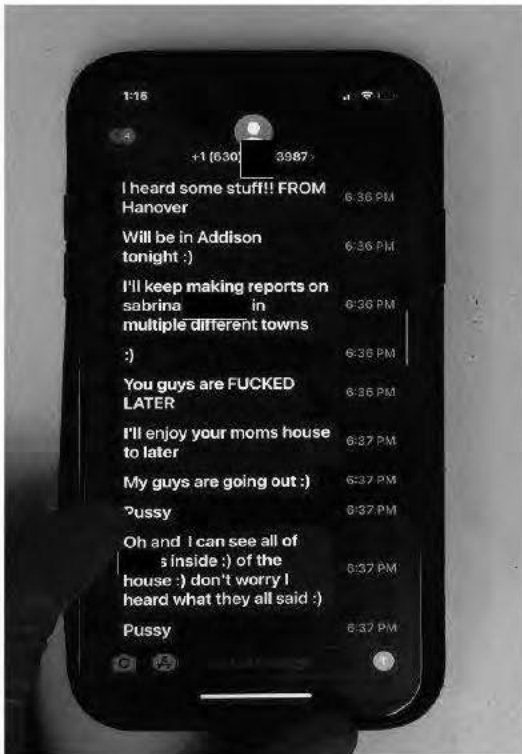
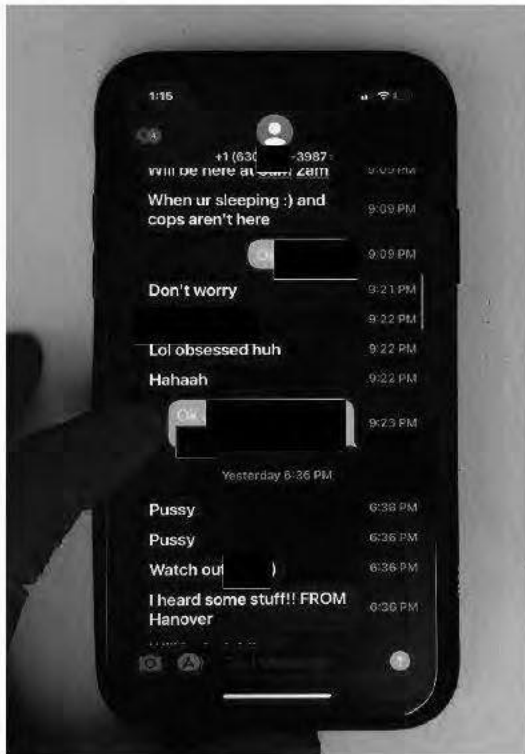
18. According to local police reports, on or about November 23, 2021, at approximately 6:36 p.m., Individual A began receiving threatening messages on her cell phone from number 630-XXX-3987. These messages stated, among other things, "YOU GUYS ARE DEAD," "You guys are FUCKED LATER," and "My guys are going out :)" and showed a picture of men with guns.

Individual D

Individual A

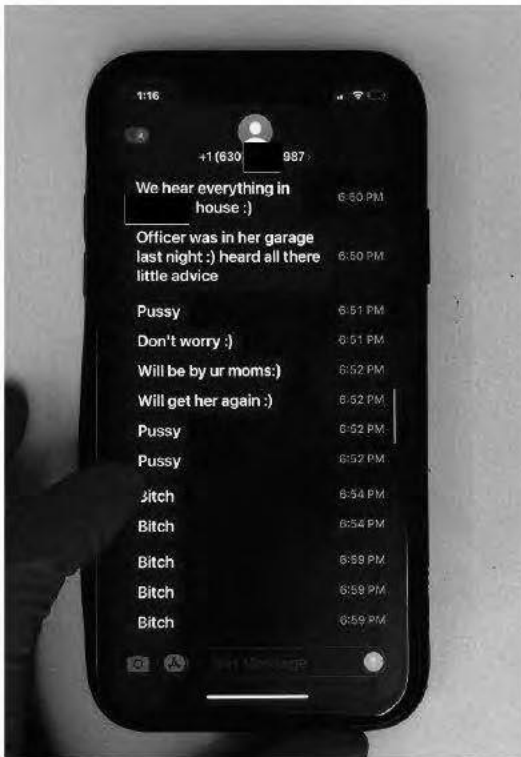
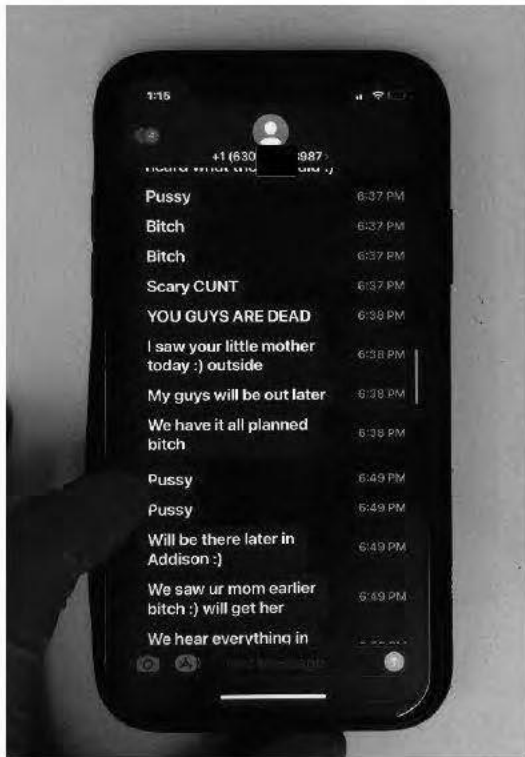
Individual D

Individual A

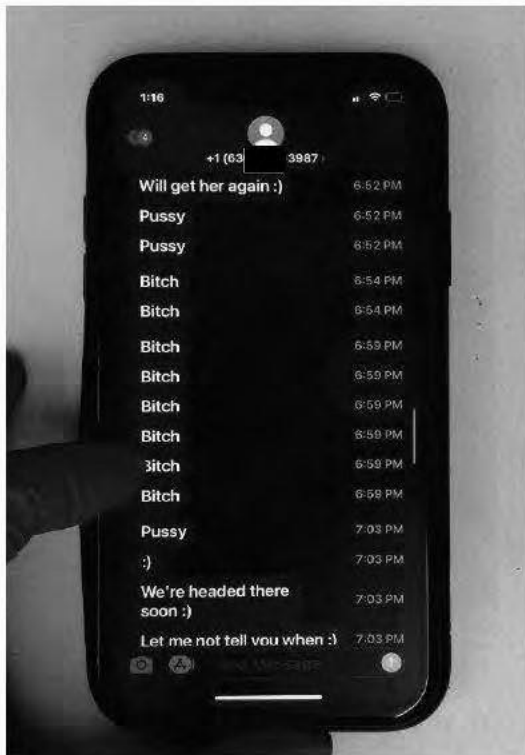


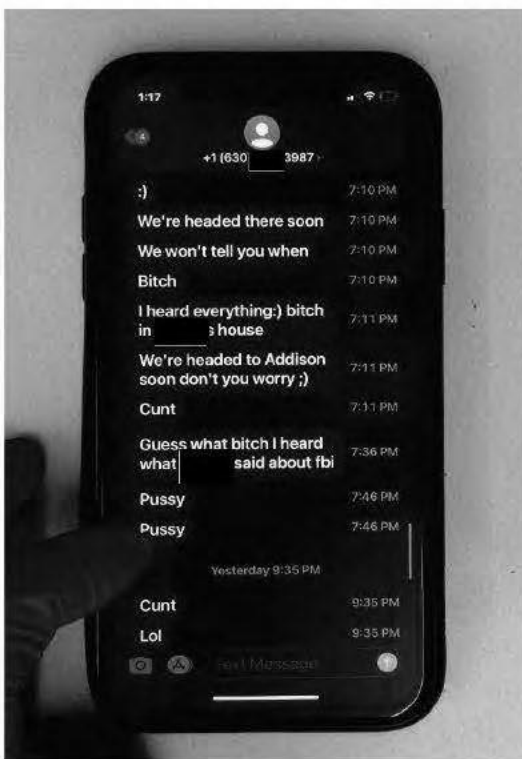
Individual C

Individual C



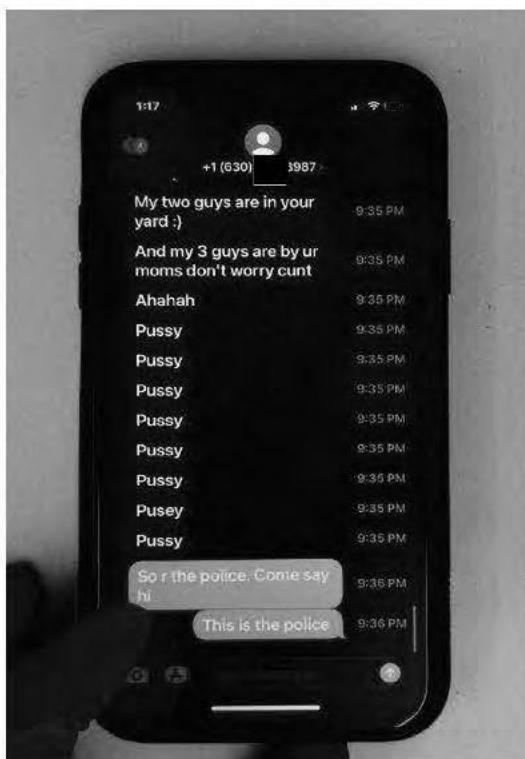
Individual B





Individual B

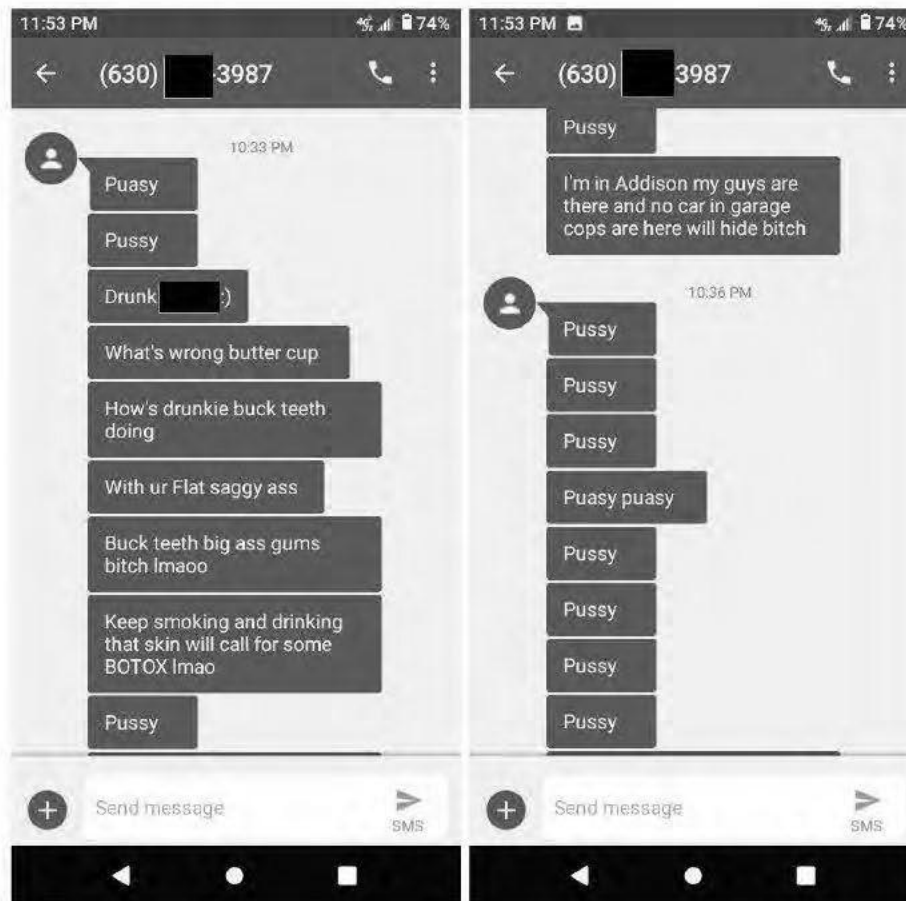
Individual B

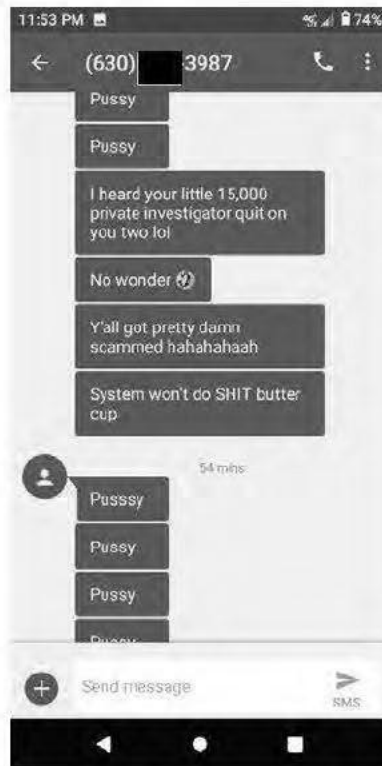




19. According to a local police report, 630-XXX-3987 was further used on or about November 26, 2021, to send additional threatening and stalking messages to individuals. Such messages were sent to Individual B, and included, among other messages, “I’m in Addison”—where Individual G resides—“my guys are there and no car in garage cops are here will hide bitch,” and, repeatedly, “Pussy.” Images of the messages to Individual B are below.

Individual B





20. According to records from Bandwidth, a voice-messaging software company, phone number 630-XXX-3987 is subscribed to and owned by Ad Hoc Labs, Inc., which does business as Burner. According to Burner's website, Burner is located in California. According to Burner records, CANALE Phone 2 was registered as the user of phone number 630-XXX-3987 on November 8, 2021, at approximately 8:29 p.m., approximately the same time the threatening and harassing messages from phone number 630-XXX-3987 began. Burner records show that CANALE Phone 2 was the user of phone number 630-XXX-3987 from November 8, 2021, to November 29, 2021.

21. According to publicly available information about Burner, as well as my personal experience with the application, Burner requires that to receive a temporary number, a user must register a cellular telephone number or email address. Burner



sends a verification message and confirmation code to that number or address, which the user must confirm by entering the code into the application, which permits them to set up a Burner account.<sup>13</sup> As a result, CANALE Phone 2 would have had to enter a verification code sent by Burner via text before accessing phone number 630-XXX-3987. According to T-Mobile toll records, on November 8, 2021, at approximately 7:15:47 p.m.—approximately an hour and 15 minutes before the threatening and harassing messages from phone number 630-XXX-3987 began—CANALE Phone 2 received a text message from 833-XXX-0459, to which CANALE Phone 2 replied at approximately 7:15:48 p.m.<sup>14</sup> Based on an open-source search and my discussions with Burner, the number ending in 0459 was used by Burner to confirm users' telephone numbers on November 8, 2021. Accordingly, I believe the 7:15 p.m. text and response was Burner's effort to verify CANALE's phone number.

22. On or about November 18, 2021, CANALE consented to a search of CANALE Phone 2. A review of CANALE Phone 2's data showed that CANALE Phone 2 accessed the Burner application on November 8, 2021 at 7:15:38–7:15:41 p.m. and 7:17:59 p.m., approximately the same time the Burner account was created and

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<sup>13</sup> Based on my training and experience, some service providers, though not all, verify users' email accounts or telephone numbers by sending a message that the receiving user accesses to confirm their access to the registered email or telephone number.

<sup>14</sup> Based on the rapid succession between these two messages as reflected in the phone records, and my experience with Burner's verification process, I do not believe CANALE would have had to manually respond by text message to Burner to be verified.

approximately one hour and 15 minutes before the threatening and harassing messages from phone number 630-XXX-3987 began.<sup>15</sup>

23. According to records provided by Burner, the IP addresses used to register CANALE Phone 2 as a user on or about November 8, 2021, were IP addresses associated with T-Mobile. According to T-Mobile Records, CANALE Phone 2's carrier was, in November 2021, T-Mobile.

24. On January 18, 2022, local police obtained a search warrant for iCloud account rosecanale20@icloud.com<sup>16</sup> ("CANALE iCloud Account 1"), believed to belong to CANALE based on previous consent extractions of CANALE Phone 2.<sup>17</sup> According to the Apple returns for CANALE iCloud Account 1, on November 8, 2021 at 7:18:30 p.m. CANALE received an email verifying a premium subscription to Burner which included a one-week free trial period. Based on my experience with the Burner

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<sup>15</sup> According to local law enforcement, following an extraction of data from CANALE Phone 2 on November 18, 2021, the applications "TextFree" and "Burner" were listed as installed applications. During a subsequent manual review of CANALE Phone 2, local law enforcement did not see either application on CANALE Phone 2. Based on my training and experience, this is consistent with CANALE deleting the applications from her device.

<sup>16</sup> According to Illinois State Records, CANALE's middle initial is "R." According to bank records, CANALE's middle name is "Rose."

<sup>17</sup> On or about November 30, 2021, CANALE and Individual C went to a local police department to file a report. Local police requested to conduct a new extraction of CANALE Phone 2. Local police reported CANALE was resistant, but eventually consented to an extraction. Upon review of the device, local police reported CANALE's cell phone was heavily damaged, with the glass shattered on both sides, multiple impact marks, and a bent frame. CANALE claimed to have accidentally dropped her phone from the second-floor balcony of her home to the first floor. On or about April 29, 2022, CANALE was interviewed. According to CANALE, CANALE Phone 2 was in fact damaged by her boyfriend during an altercation where her boyfriend threw CANALE Phone 2. CANALE stated she lied to detectives because she did not want to embarrass her boyfriend.

application, a premium subscription is paid for by the subscriber and allows the subscriber to use up to three app-based phone numbers at one time.

25. Further, according to the returns for CANALE iCloud Account 1: On November 14, 2021 at 11:22:30 p.m. CANALE received an email stating her Burner subscription charge had been declined by her credit card.<sup>18</sup> On November 17, 2021 at 7:23:08 p.m., CANALE received an email verifying a premium subscription to Burner. And on November 18, 2021 at 2:03:41 p.m., CANALE received a billing email for her Burner subscription.

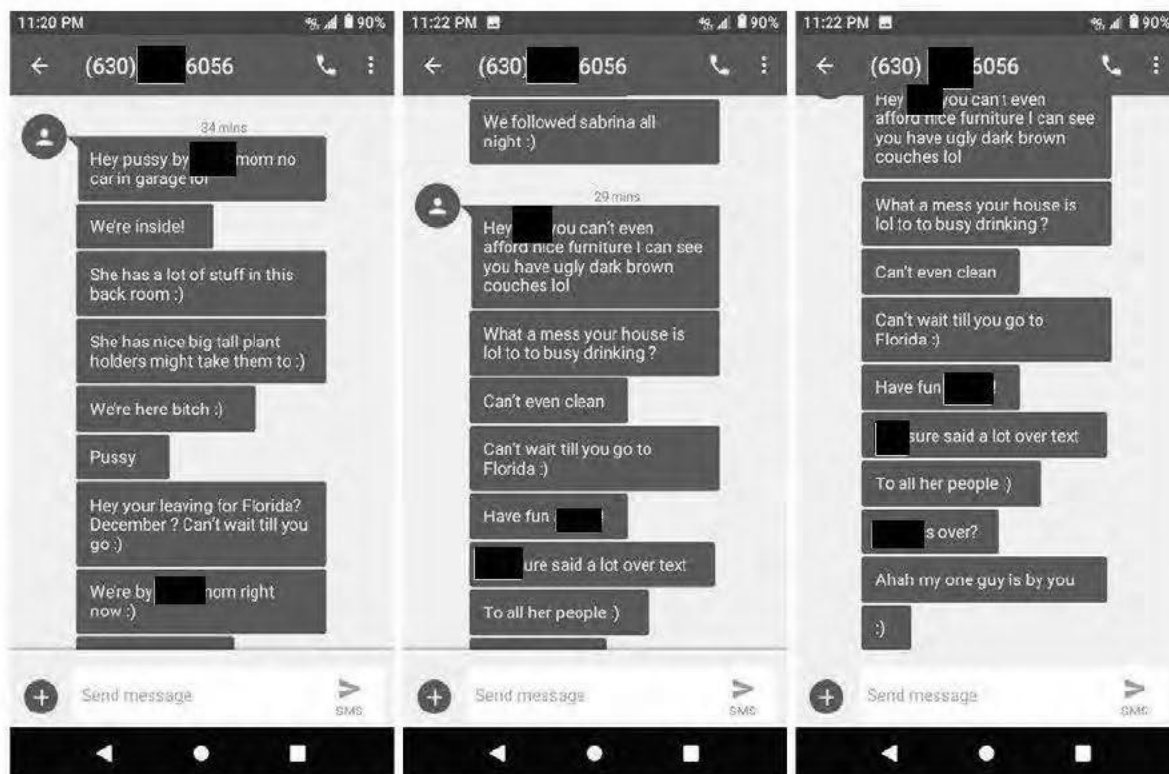
**b. Subject Number 630-XXX-6056**

26. According to local police, beginning on or about November 22, 2021, Individual B began receiving harassing and threatening messages on her cell phone from phone number 630-XXX-6056. These messages stated, among other things, “Hey pussy [Individual A’s] mom no car in garage lol”, “Can’t wait till you go to Florida :).”<sup>19</sup> Images of the messages are below.

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<sup>18</sup> According to JP Morgan Chase records, on or about November 8, 2021, November 15, 2021, and November 18, 2021, CANALE’s card was charged by Apple. Based on my experience, when downloading subscriptions through the Apple App Store, the subscriptions may be charged as Apple purchases, rather than in the name of the downloaded application’s actual service provider. Aside from these charges, and more broadly, CANALE had numerous charges from Apple subscriptions according to Chase records during the course of the investigation. According to bank records, beginning around July 2022, CANALE disputed many of these charges. The records do not appear to indicate that CANALE disputed the charges from November 8, 2021, November 15, 2021, and November 18, 2021.

<sup>19</sup> Throughout this affidavit, I have added in brackets my interpretation of certain messages. These interpretations are used as redactions to block Individuals’ names and/or are based on my training and experience and my experience in this investigation.



27. According to records from Bandwidth, phone number 630-XXX-6056 is subscribed to and owned by Ad Hoc Labs Inc., which does business as Burner. According to records provided by Burner on or about March 2, 2022, phone number 630-XXX-6056 was registered to CANALE Phone 2 on or about November 8, 2021, at 7:17 p.m. Burner records show that CANALE Phone 2 was the user of phone number 630-XXX-6056 from November 8, 2021, to January 28, 2022.

28. As noted, based on information provided by Burner and publicly-available information, CANALE Phone 2 would have had to enter a verification code sent by Burner via text before accessing phone number 630-XXX-6056. According to T-Mobile toll records for CANALE Phone 2, on November 8, 2021, at approximately 7:15:47 p.m.—one minute before phone number 630-XXX-6056 was assigned to CANALE Phone 2's account—CANALE Phone 2 received a text message from 833-

XXX-0459, to which CANALE Phone 2 replied at approximately 7:15:48 p.m.<sup>20</sup>. Based on an open-source search and my discussions with Burner, the number ending in 0459 was used by Burner to confirm users' telephone numbers on November 8, 2021. Accordingly, I believe the 7:15 p.m. text and response was Burner's effort to verify CANALE's phone number.

29. Additionally, a review of CANALE Phone 2's data, which CANALE consented in writing to being extracted by local police on or about November 18, 2021, showed that at the following times on November 8, 2021, CANALE Phone 2 accessed the Burner application: 7:15:38–7:15:41 p.m. and 7:17:59 p.m., approximately the same time CANALE's Burner account was created.

30. According to records provided by Burner, the IP addresses used to register CANALE Phone 2 as a user on or about November 8, 2021, were IP addresses associated with T-Mobile. According to T-Mobile Records, CANALE Phone 2's carrier was, in November 2021, T-Mobile. Further, according to the Apple returns for CANALE iCloud Account 1, on November 8, 2021 at 7:18:30 p.m., CANALE received an email verifying a premium subscription to Burner which included a one-week free trial period.

**c. Subject Number 224-XXX-7444**

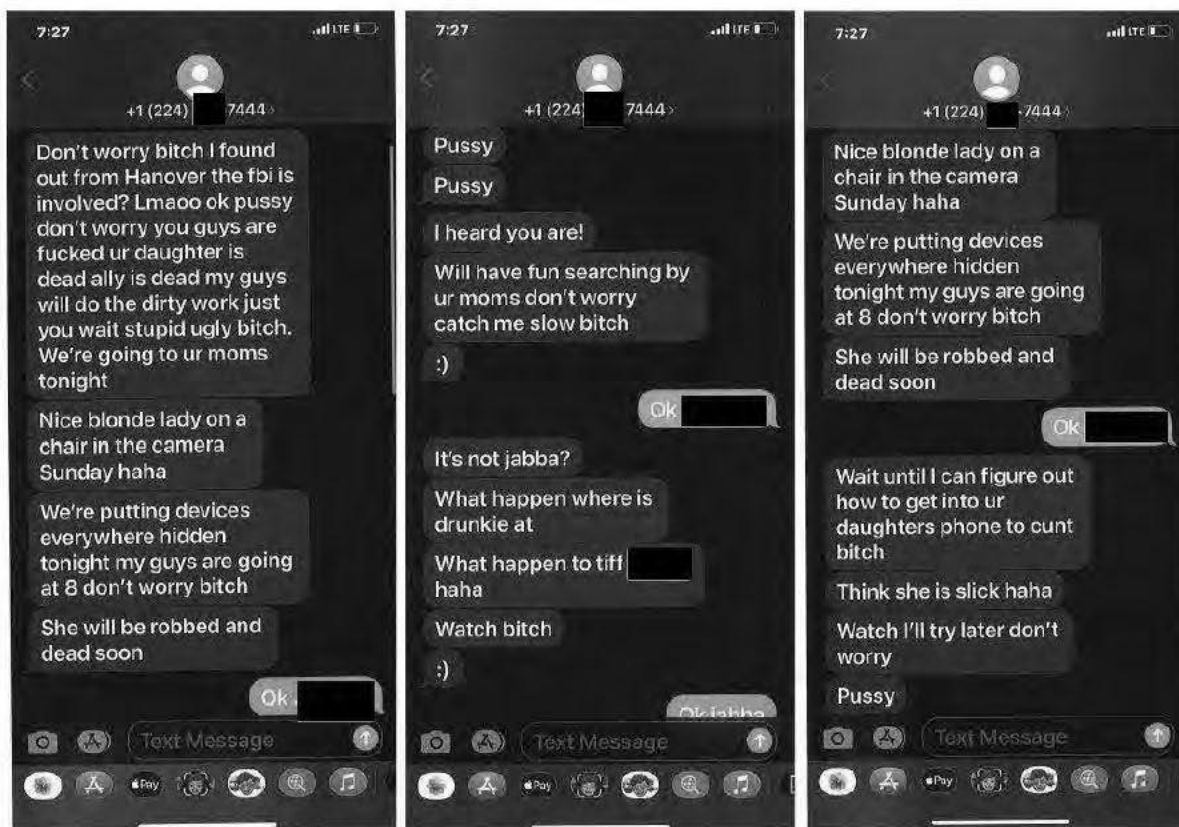
31. According to local police, on or about November 10, 2021, Individual A began receiving threatening and stalking messages on her cell phone from phone

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<sup>20</sup> As noted above, based on the rapid succession between these two messages as reflected in the phone records, and my experience with Burner's verification process, I do not believe CANALE would have had to manually respond by text message to Burner to be verified.



number 224-XXX-7444.<sup>21</sup> These messages stated, among other things, “I found out from Hanover [Police Department] the fbi is involved? Lmaoo ok pussy don’t worry you guys are fucked ur daughter is dead [CANALE] is dead my guys will do the dirty work just you wait stupid ugly bitch. We’re going to ur moms [Individual G] tonight.” They also stated, “She [Individual G] will be robbed and dead soon.” Images of the messages are below.



32. According to records from Bandwidth, phone number 224-XXX-7444 is subscribed to and owned by Ad Hoc Labs, Inc., which does business as Burner. According to records provided by Burner on or about January 4, 2022, phone number

<sup>21</sup> In certain legal process Burner Phone 2 was listed as 224-XXX-7444, but unredacted, with one incorrect digit in the middle three digits.



224-XXX-7444 was registered to CANALE Phone 2 on or about November 10, 2021, at 2:39 p.m. Burner records show that CANALE Phone 2 was the registered user of phone number 224-XXX-7444 from November 10, 2021, to November 29, 2021.

33. As noted, based on my experience with Burner and publicly available information, CANALE Phone 2 would have had to enter a verification code provided by Burner via text before accessing phone number 224-XXX-7444. According to T-Mobile toll records on CANALE Phone 2, on November 10, 2021, at 2:38:47 p.m., CANALE Phone 2 received a text message from 833-XXX-0436. Based on open-source searches and my experience with Burner, that number was used by the application to confirm users' telephone numbers. Accordingly, I believe the 2:38 p.m. text was Burner's effort to verify CANALE's phone number.

34. Additionally, a consent search of CANALE Phone 2's data showed that at the following times on November 10, 2021, CANALE Phone 2 accessed the Burner application: 2:38:42 p.m.—2:38:45 p.m., approximately the same time phone number 224-XXX-7444 was created and approximately two minutes before the threatening and harassing messages from phone number 224-XXX-7444 began.

**d. Subject Number 331-XXX-5437**

35. According to local police, on or about November 29, 2021, Individual B received harassing messages from telephone number 331-XXX-5437. Based on the police report, these messages to Individual B, in substance, commented on the

location of Individual B's child. The messages also claimed to have left items in Individual B's backyard.<sup>22</sup>

36. According to Bandwidth records, 331-XXX-5437 is subscribed to and owned by TextNow. Based on a review of TextNow records, on or about November 29, 2021, starting at approximately 9:16:44 p.m. through approximately 10:29:36 p.m., the user of 331-XXX-5437 sent harassing messages to Individual B, to which Individual B responded. For example, the user of 331-XXX-5437 sent messages, including "Hey drunk bitch", "[Individual C] left? Just a few seconds ago," "Stupid bitch," "I'll put stuff in ur yard again in a bit."

37. According to TextNow's website, TextNow is located in Canada. Based on my experience with TextNow, when a user opens the TextNow application, the user is prompted to sign up. The user can sign up using their Apple ID, Google account, Facebook account, or create a separate log-in email address.<sup>23</sup> Based on my experience with the application, if the user selects to use their Apple ID on an iOS device, they are prompted to decide whether to "Share My Email" or "Hide My Email."

38. According to TextNow records, the email address gr8fz4gpsd@privaterelay.appleid.com was the user of the phone number ending in 5437 from approximately November 29, 2021 at 7:35:31 p.m. through December 7,

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<sup>22</sup> In a previous affidavit submitted to Magistrate Judge Jeffrey T. Gilbert regarding a request for search warrants of various texting applications, Individual A was listed as the recipient of these messages. Upon further review of police reports as well as search warrant returns from TextNow, Individual B was the recipient of the listed harassing messages.

<sup>23</sup> Based on my experience with the application, TextNow may send a user verification message, but to use TextNow, verification is not actually required.

2021 at 10:49:03 p.m. According to Apple records, CANALE iCloud Account 1 used gr8fz4gpsd@privaterelay.appleid.com as a “Sign in with Apple Private Email Relay Address.” Based on my training and experience, as well as publicly available information, this email address is an Apple Private Relay address, which is a randomized address provided by Apple to third parties to obfuscate the user’s true address. Moreover, a consensual search of CANALE Phone 2 revealed the use of gr8fz4gpsd@privaterelay.appleid.com in CANALE iCloud Account 1.

39. Other records, as described below, show that CANALE used another TextNow account registered to the Private Relay email address:

a. According to TextNow records, email gr8fzgpsd@privaterelay.appleid.com was the user of another TextNow telephone number, 331-XXX-5069, from approximately November 14, 2021 at 10:13:32 p.m. until the last listed communication date of November 14, 2021 at 10:15 p.m.<sup>24</sup>

b. According to TextNow records, on or about November 14, 2021, the user of TextNow phone number 331-XXX-5069 sent a message to CANALE Phone 2 which said “Hey”. On the same date, the user of TextNow phone number 331-XXX-5069 sent messages to the user of telephone number 312-XXX-4279. That number,

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<sup>24</sup> On or about March 31, 2022, Magistrate Judge Jeffrey T. Gilbert issued a search warrant to TextNow, Inc., for records associated with the user account gr8fzgpsd@privaterelay.appleid.com. In response to that warrant, TextNow provided returns and content for all TextNow phone numbers assigned to user account gr8fzgpsd@privaterelay.appleid.com, including for a phone number which was not specified in the warrant. On or about April 28, 2022, Magistrate Judge Jeffrey I. Cummings issued a search warrant to TextNow, Inc. for records already in the government’s possession, including content for all TextNow phone numbers assigned to user account gr8fzgpsd@privaterelay.appleid.com.

according to AT&T records, was used by “[Individual J] The Great,” believed to be a former partner of CANALE’s.<sup>25</sup> The messages said, in part, “***Hey it’s Sabrina*** ... can u unblock me” (emphasis added), “Btw if u ever text me off a text now app I won’t get it .. so u gotta do like text plus or sum”, “I haven’t heard from you”, “I’m worried”, “Plz answer back ..”, “Or unblock my 630 XXX 2110 number” (CANALE Phone 2), and “I have mg iPhone back”.<sup>26</sup>

c. According to TextNow records, the account was created using a T-Mobile IP address on or about November 14, 2021. According to a local police report filed on November 4, 2021, CANALE was using CANALE Phone 2 at this time which was registered to T-Mobile.

**e. Subject Number 224-XXX-0242**

40. According to TextPlus records, local police, and Individual A, beginning on or about November 26, 2021, through approximately February 23, 2022, the number 224-XXX-0242 was used to send threatening, stalking, and harassing communications to individuals, including Individual A, Individual B, Individual C, Individual H, and CANALE.

41. On January 11, 2022, for example, the user of 224-XXX-0242 sent Individual A messages, calling her, among other things, a “Pussy” and a “bitch.” Images of these messages are below.

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<sup>25</sup> According to an open-source search, phone number 312-XXX-4279 is registered to Individual J. Police reports indicate that the two had been in a relationship.



42. Additionally, on January 30, 2022, the user of 224-XXX-0242 sent additional messages to Individual A, calling her a “little bitch,” claiming to have recordings apparently of Individual A and/or her family, and commenting on the alleged whereabouts of Individual B’s minor children. Images of the messages are below.





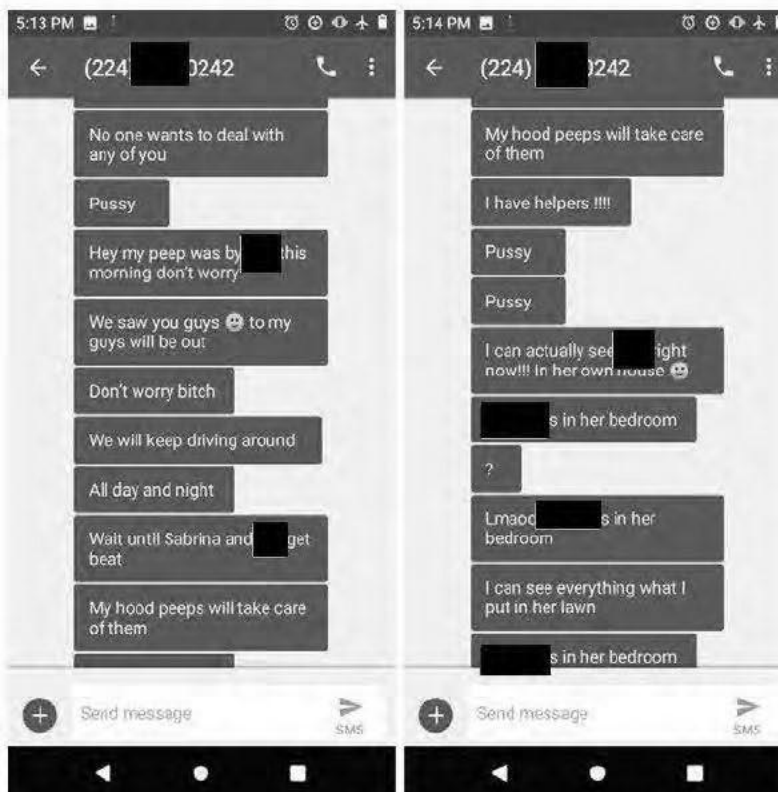


Unknown Individual

Individual B

Unknown Individual

Unknown Individual



Individual B

Individual C

Individual B

Individual B's Child

Individual B's Child

Individual B's Child

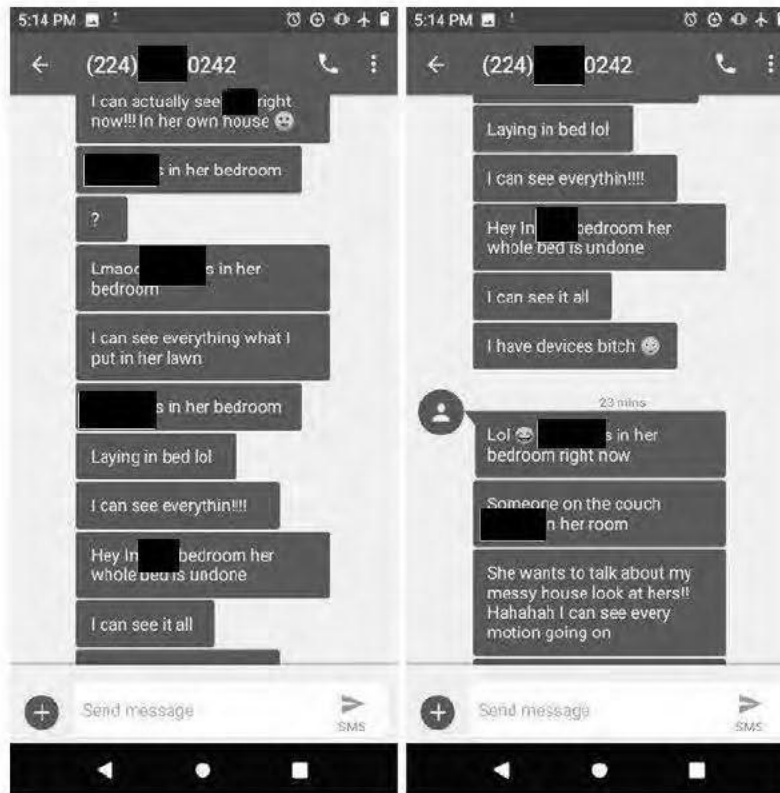
Individual B

Individual B's  
Child

Individual B's  
Child

Individual B's  
Child

Individual B



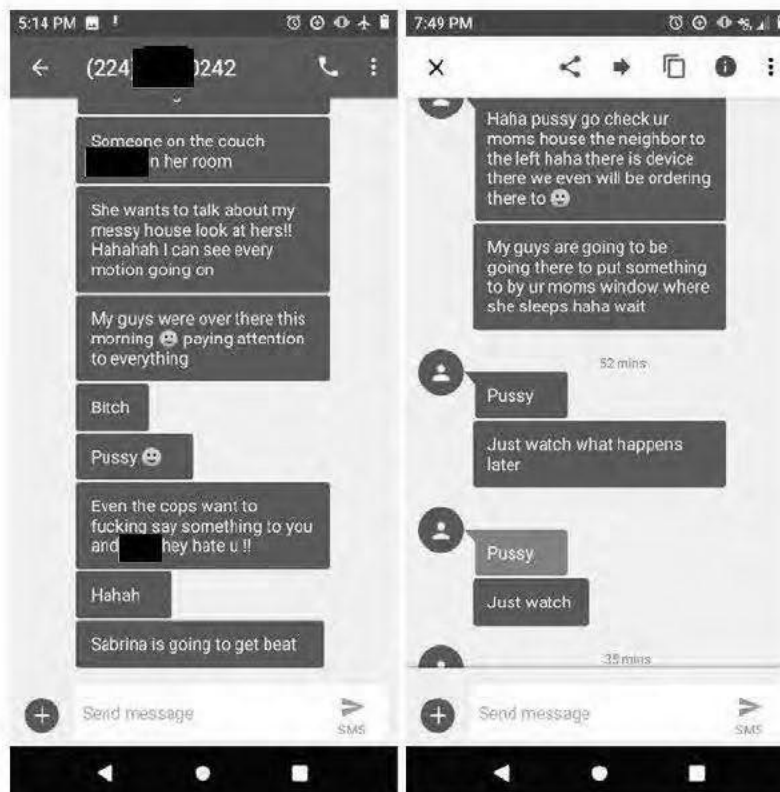
Individual B

Individual B's  
Child

Individual B's  
Child

Individual B's  
Child

Individual B





Individual B

43. Further, according to Individual A, on or about February 22, 2022, the user of the number sent messages to a phone used by CANALE. These messages said, “Pussy lol your little whore friend is fucked” and alleged to have recordings of conversations had by Individual C. Based on the content of the messages and my experience in this investigation, I believe the “friend” referenced is Individual C. An image of the messages is below.



Individual C's  
Friend

Individual C's  
Boyfriend

Individual C's  
Boyfriend

Individual C's  
Friend

Individual C

Individual C's  
Boyfriend



44. According to Individual A, on or about February 23, 2022, the user of 224-XXX-0242 sent messages to a phone used by CANALE. These messages said that CANALE and Individual C were “dead,” noted that CANALE was in line at a Dunkin Donuts, and threatened to “fuck” with CANALE’s vehicle. An image of the messages is below.



Individual C

Business B



45. According to records from Inteliquent, a voice-messaging software company, phone number 224-XXX-0242 belongs to TextPlus. According to TextPlus's website, TextPlus is located in California. Based on my experience with TextPlus, when a user opens the TextPlus application, the user is prompted to sign up. The user can sign up using their Apple account, Google account, Microsoft account, or Yahoo account.. Based on my experience with the application, if the user selects to use their Apple ID on an iOS device, they are prompted to decide whether to "Share My Email" or "Hide My Email."

46. According to records from TextPlus, the account holding phone number 224-XXX-0242 was created on approximately December 23, 2021 at 4:59 p.m.<sup>27</sup> According to TextPlus records, the account using phone number 224-XXX-0242 was created by mhtkhgd8ns@privaterelay.appleid.com. According to Apple records, sabrinacanale21@icloud.com (“CANALE iCloud Account 2”) was associated with mhtkhgd8ns@privaterelay.appleid.com. Apple records indicate CANALE is the registered user of CANALE iCloud Account 2, and that the account is connected to CANALE Phone 1 and was verified by CANALE Phone 1. Apple records also indicate the email address is associated with CANALE’s residence.

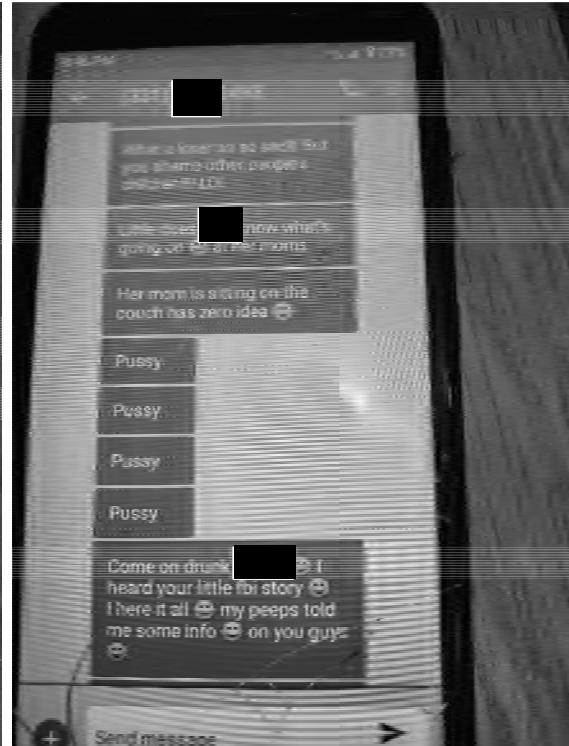
**f. Subject Number 331-XXX-2493**

47. According to Individual B, on or about February 6, 2022, through approximately February 9, 2022, Individual B received harassing and threatening communications from phone number 331-XXX-2493. For example, on or about February 6, 2022, the user of 331-XXX-2493 sent messages to Individual B which commented on her minor child’s location, and in reference to Individual G stated, “my guys will be out.” Images of the messages are below.

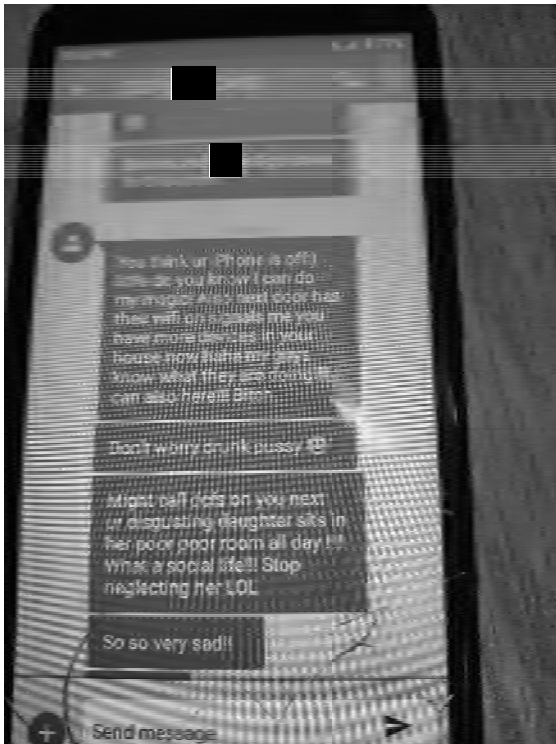
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<sup>27</sup> In response to a subpoena served to TextPlus on or about January 14, 2022, TextPlus provided content of messages sent and received by the user of 224-XXX-0242. The content has not been reviewed, is maintained on a sealed disc, and was not used in any manner in the investigation.

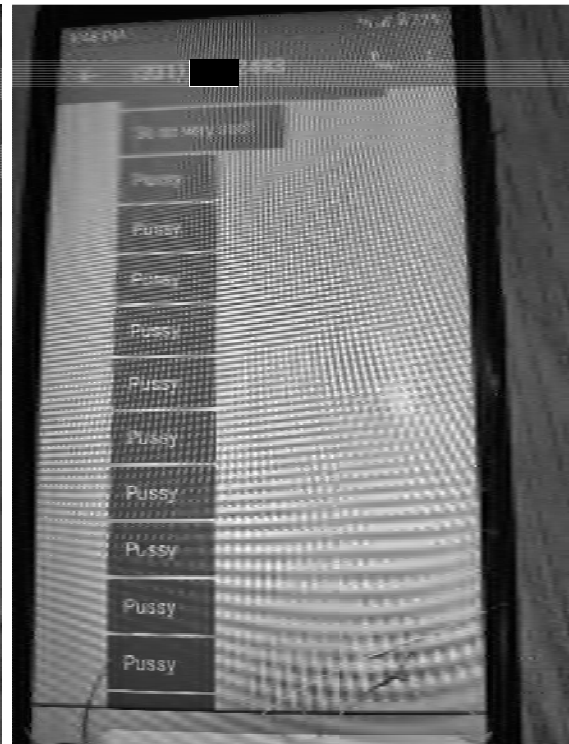
Individual B's  
Child



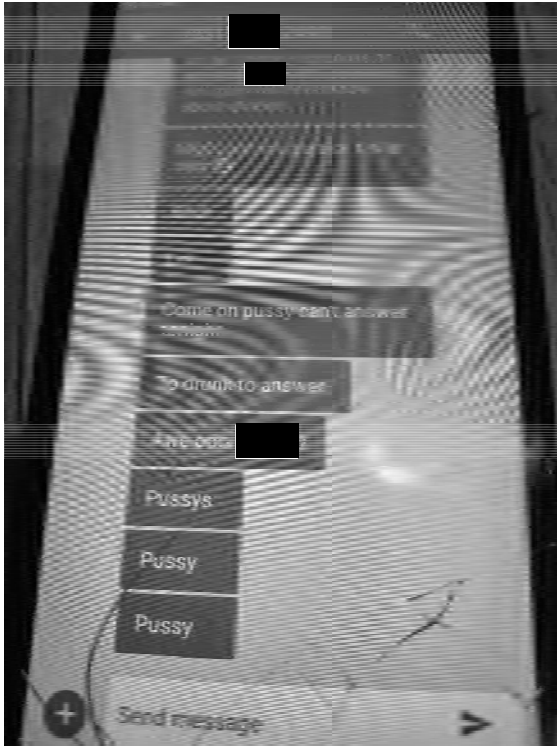
Individual B



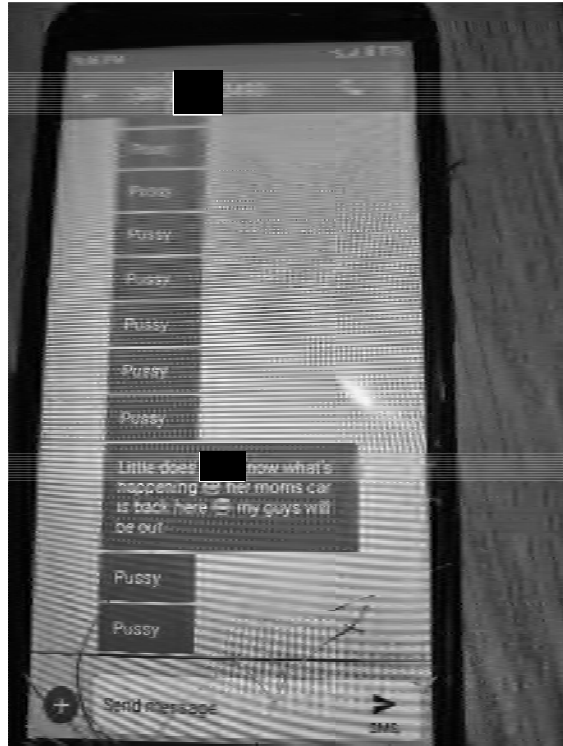
Individual C



Individual A



Individual B



Individual A

48. According to Bandwidth records, 331-XXX-2493 is subscribed to and owned by TextNow. According to TextNow records, email 5cqkzngz2r@privaterelay.appleid.com was the registered user of telephone number 331-XXX-2493 from approximately February 6, 2022 at 9:02 p.m. until the last listed communication date of February 9, 2022 at 10:59 p.m. According to Apple records, 5cqkzngz2r@privaterelay.appleid.com was associated with CANALE iCloud Account 2. Further, according to TextNow records, the account was created using a T-Mobile IP address on or about January 24, 2022. According to an interview of Individual A, CANALE was using CANALE Phone 1 on or around January 21, 2022. Based on T-Mobile records CANALE Phone 1 was registered to T-Mobile.<sup>28</sup>

<sup>28</sup> According to an interview of Individual A on February 11, 2022, on or about February 9, 2022 CANALE began using CANALE Phone 3, a Motorola Android phone. The phone

49. According to Apple returns for the CANALE iCloud Account 1, CANALE has previously used the TextNow application based on emails received by the CANALE iCloud Account 1. For example:

a. According to Apple returns for the CANALE iCloud Account 1, on October 2, 2021, at approximately 1:44 a.m., October 3, 2021, at 1:28:03 a.m., and October 4, 2021, at approximately 1:24 a.m., the CANALE iCloud Account 1 received emails from TextNow alerting her that her current TextNow phone number was about to expire.

b. According to Apple returns for the CANALE iCloud Account 1, on or about October 4, 2021, at approximately 11:57 p.m., the CANALE iCloud Account 1 received an email from TextNow alerting her that her current TextNow phone number, 331-XXX-4768, had been reassigned.

**g. Subject Number 331-XXX-7643**

50. According to TextNow records, email 5cqkzngz2r@privaterelay.appleid.com was the user of telephone number 331-XXX-7643 from approximately January 24, 2022 at 5:22 p.m. until January 31, 2022 at 11:34 p.m.<sup>29</sup>

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belonged to Individual C prior to CANALE using the phone. According to a February 11, 2022 interview of Individual B, CANALE was using a new SIM card for CANALE Phone 3. Individual B stated any application can be downloaded onto CANALE Phone 3 using the Google Play Store. According to an interview of Individual A on February 11, 2022, CANALE told Individual A the application TextNow was already downloaded on CANALE Phone 3 when CANALE started using the device.

<sup>29</sup> As noted, on or about March 31, 2022, Magistrate Judge Jeffrey T. Gilbert issued a search warrant to TextNow, Inc., for records associated with the user account 5cqkzngz2r@privaterelay.appleid.com. In response to that warrant, TextNow provided



51. According to TextNow records, on or about January 24, 2022, the user of TextNow phone number 331-XXX-7643 sent harassing and threatening messages to Individual B. The messages said, in part, “You seem to forget I have everyone’s location ahahah”, “Ordering food to her little moms house but to her Nehibors (sic)”. On or about January 24, 2022, the user of TextNow phone number 331-XXX-7643 sent harassing and threatening messages to Individual C. The messages said, in part, “Hey little whore hahahah”, “Pussy”, “Haha ur debit card info is on the account to perfect:) you are the main account holder I see?”

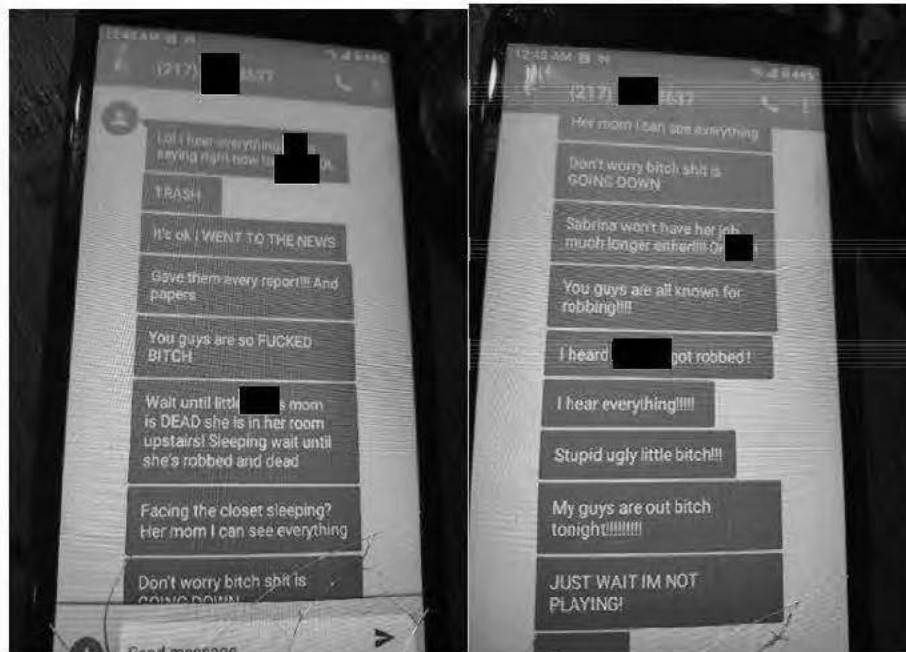
52. According to search warrant returns from TextNow, the account associated with phone number 331-XXX-7643 was created on January 24, 2022, at approximately 5:22 p.m. and the registered email address was 5cqkzngz2r@privaterelay.appleid.com. As noted, according to Apple records, 5cqkzngz2r@privaterelay.appleid.com was associated with CANALE iCloud Account 2. Further, according to TextNow records, the account was created using a T-Mobile IP address on or about January 24, 2022. According to an interview of Individual A on January 21, 2022, CANALE was using CANALE Phone 1 at this time which, according to T-Mobile records was registered to T-Mobile.

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returns and content for all TextNow phone numbers assigned to user account 5cqkzngz2r@privaterelay.appleid.com, including for a phone number which was not specified in the warrant. On or about April 28, 2022, Magistrate Judge Jeffrey I. Cummings issued a search warrant to TextNow, Inc. for records already in the government’s possession, including content for all TextNow phone numbers assigned to user account 5cqkzngz2r@privaterelay.appleid.com.

### h. Subject Number 217-XXX-8637

53. According to Individual B, beginning on or about March 6, 2022, Individual B began receiving harassing and threatening messages from phone number 217-XXX-8637. The user of phone number 217-XXX-8637 messaged Individual B to wait until Individual A's mom, Individual G, is "DEAD", and alleged that the sender could see Individual G sleeping. Images of the messages are below.



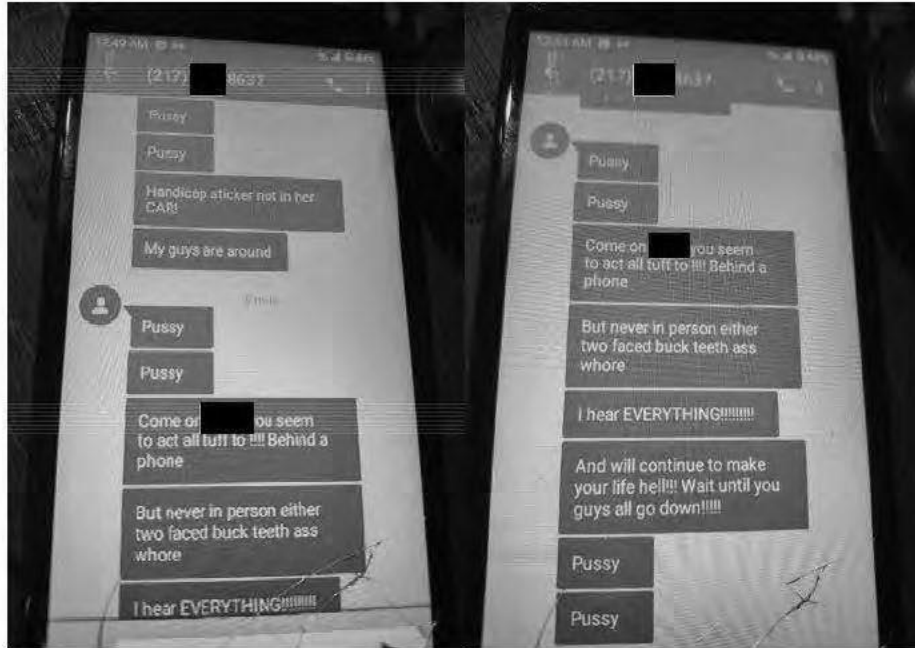
Individual C  
Individual C's  
Boyfriend

Individual A

Individual C

Unknown  
Individual

Individual B



Individual B

54. Additionally, on or about March 6, 2022, the user of phone number 217-XXX-8637 messaged Individual C,<sup>30</sup> calling individual C a “stank ass whore” and a “pussy.” Images of the messages are below.

<sup>30</sup> Individuals sent the FBI screenshots of the harassing and threatening messages and on multiple occasions Individual B sent the FBI screenshots of messages sent to CANALE, Individual A, and Individual C. The affidavit notes the individual to whom harassing and threatening messages were sent, and not necessarily the individual who forwarded the messages to the FBI.



<sup>31</sup> As relevant below, and for purposes of this affidavit, such email addresses may include email addresses: (1) for which provider records state that the provider does not have any record of an account holder, which I believe to mean that the email is not in fact a valid email, or (2) for which the government does not yet have records from the provider, but which I nonetheless believe to be email addresses invented for the purpose of opening a texting-application account—or, as referred to below, a “fictitious” email address. For each of the believed fictitious accounts for which the government does not have records noted below, my belief that the email address is fictitious is based on my experience in this investigation, which has shown that text-messaging accounts otherwise connected to CANALE have email addresses for which there is no record of an account holder according to the provider. In addition, some of the believed fictitious email addresses referenced below are variations of certain Individual’s names—like Individual A, B, C, and CANALE—but are not, based on my experience in this investigation, email addresses actually utilized by those Individuals.

56. According to TextMe records, the account holding 217-XXX-8637 was created on or about December 8, 2021, at approximately 6:03 p.m., and the registered email address was ballmeat57@gmail.com. TextMe records indicate the account was created using an AT&T IP address with a Motorola-Moto G Play (2021) (10) or a Motorola-Moto G Play (2021) (11) device. According to TextMe records, phone number 217-XXX-8637 was assigned to the account on or about March 6, 2022 at 12:32 a.m. TextMe records did not list an end date for the phone number.

57. According to interviews of Individual A and Individual B, at the time the phone number ending in 8637 was used to send messages, CANALE was using CANALE Phone 3, a Motorola Moto phone registered to AT&T. According to Google records for ballmeat57@gmail.com, CANALE Phone 3 is listed as both the account recovery SMS phone number as well as the sign-in phone number.<sup>32</sup>

**i. Subject Number 312-XXX-1884**

58. According to Individual B, beginning on or about April 26, 2022, Individual C began receiving harassing and threatening messages from phone number 312-XXX-1884. The user of phone number 312-XXX-1884 messaged Individual C about Facebook Profile 1—which, as discussed below, was a Facebook profile with Individual C’s and CANALE’s names and photographs and claiming that

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<sup>32</sup> According to the consent review of Individual C’s phone on or about December 9, 2021, CANALE Phone 3 was saved under the name “Meatball” in Individual C’s phone. According to an interview of Individual B on or about March 9, 2022, “Meatball” is a nickname for CANALE.



they were “prostitutes.” The user of the number stated the messenger knew both Individual C’s and CANALE’s home addresses.<sup>33</sup>

59. According to Inteliquent records, phone number 312-XXX-1884 is subscribed to and owned by TextMe. According to TextMe records, the account holding 312-XXX-1884 was created on or about April 26, 2022 at approximately 10:43 a.m., and the registered email address was meatballchampion55@gmail.com. According to a consensual search of CANALE Phone 4, meatballchampion55@gmail.com was used on CANALE Phone 4 for the Google Play Store application. According to Google records, meatballchampion55@gmail.com was created on April 10, 2022, is subscribed to Meatball Champion, with no listed address, and no recovery phone number.

60. According to TextMe records, phone number 312-XXX-1884 was assigned to the account on or about April 26, 2022 at 10:44 a.m. TextMe records did not list a withdrawal date. According to TextMe records, the registration IP for phone number 312-XXX-1884 used on or about April 26, 2022 at 10:43 a.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE’s home address on April 26, 2022 at approximately 10:43 a.m.

61. Further, according to TextMe records, phone number 630-XXX-0341—believed to be used by Individual C—called 312-XXX-1884 at approximately 11:16

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<sup>33</sup> Individual B reported the messages telephonically. Individual C did not provide screenshots of the messages as requested.

a.m. and 11:28 a.m. on April 26, 2022. The call placed at approximately 11:28 a.m. was approximately 86 seconds long. A search of CANALE Phone 4 showed an April 26, 2022, 4:56 p.m. voicemail from Individual C that was approximately 80 seconds long. The voicemail says, in part, “Or hi in the slim chance you’re actually just a poor idiot who actually believed that profile<sup>34</sup> , yea you did reach [Individual C] the girl who is being wrongfully posted on that page.” Based on my training and experience, I believe that this voicemail was found in CANALE Phone 4’s data because CANALE Phone 4 had been used to access the number 312-XXX-1884.<sup>35</sup>

**j. Subject Number 630-XXX-6465**

62. According to Individual B, beginning on or about March 8, 2022, Individual B began receiving harassing and threatening messages from phone number 630-XXX-6465. The user of phone number 630-XXX-6465 messaged Individual B, stating “I’m coming for you [Individual B]!!!! Wait until your house ,car ,kids are GONE!” Images of the messages are below.

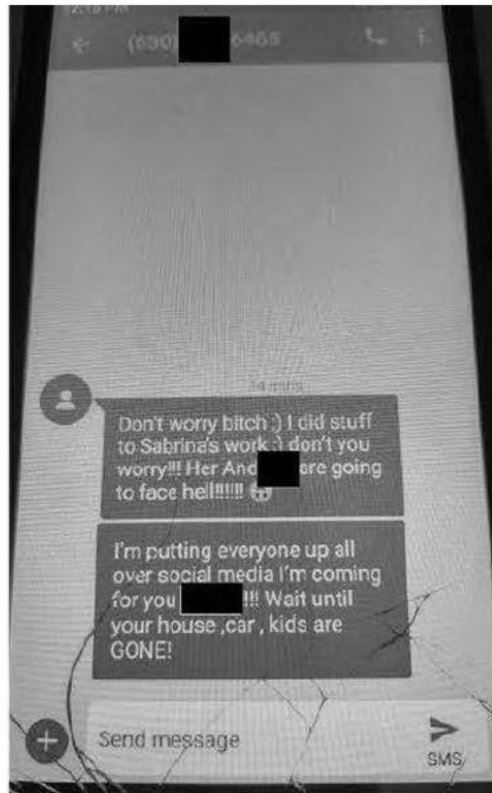
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<sup>34</sup> Based on the date and time the voicemail from Individual C was created, it is believed Individual C was referring to Facebook Profile 1.

<sup>35</sup> According to an interview of Individual C on October 27, 2022, Individual C stated she left a voicemail for a subject number in response to messages Individual C received. Individual C could not say which messages Individual C was referring to in the voicemail.

Individual C

Individual B



63. According to Inteliquent records, phone number 630-XXX-6465 is subscribed to and owned by Ooma.<sup>36</sup> According to Ooma's website, Ooma is headquartered in California. According to Subsentio returns, Subsentio is located in Virginia. Based on my experience with Talkatone, a valid email address must be entered to create a Talkatone account. Talkatone sends a verification code to the user's email address before an account can be created.

64. According to Subsentio records, the account holding phone number 630 XXX-6465 was activated on March 8, 2022. Subsentio records indicate phone number 630 XXX-6465 was assigned to the account on or about March 8, 2022 at 11:59 a.m.

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<sup>36</sup> According to Inteliquent records, phone number 630-XXX-6465 is owned by Ooma. When a records request was made to Ooma, the records were provided by Subsentio and list Talkatone as the application

According to Subsentio records, the associated email address for phone number 630-XXX-6465 was CANALE iCloud Account 2.

**k. Subject Number 773-XXX-6189**

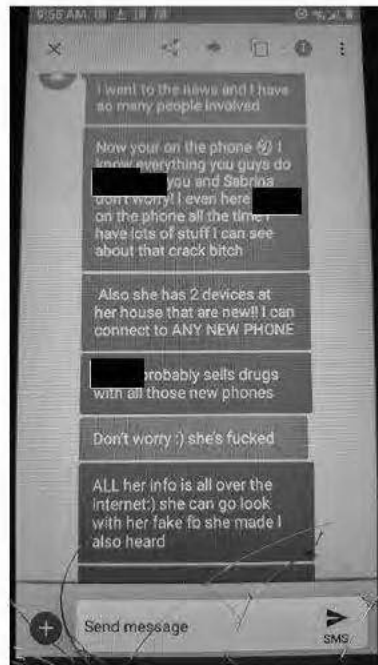
65. According to Individual A, beginning on or about March 12, 2022, Individual A began receiving harassing and threatening messages from phone number 773-XXX-6189. The user of phone number 773-XXX-6189 messaged Individual A, calling Individual A a “pussy” and stating “Haha I heard what [Individual B] said at her house”. Images of the messages are below.



Individual B

Individual B

Individual C



Individual B

Individual C

Individual B

Individual B

66. According to Inteliquent records, phone number 773-XXX-6189 is subscribed to and owned by Ooma<sup>37</sup>. According to Subsentio records, the account holding phone number 773-XXX-6189 was activated on March 11, 2022. Subsentio

<sup>37</sup> According to Inteliquent records, phone number 773-XXX-6189 is owned by Ooma. When a records request was made to Ooma, the records were provided by Subsentio and list Talkatone as the application

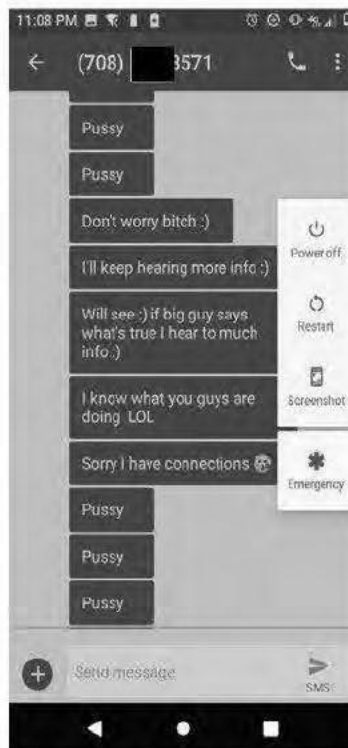
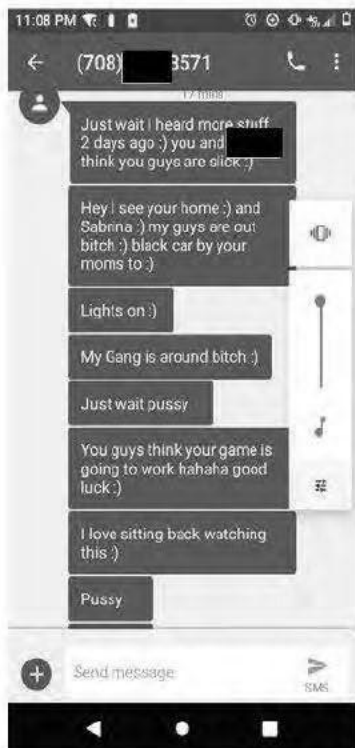


records indicate phone number 773-XXX-6189 was assigned to the account on or about March 12, 2022 at 9:38 a.m. until 9:52 a.m. According to Subsentio records, the associated email address for phone number 773-XXX-6189 was kpsftkwcxg@privaterelay.appleid.com. According to Apple records, kpsftkwcxg@privaterelay.appleid.com was associated with CANALE iCloud Account 2.

### I. Subject Number 708-XXX-3571

67. According to Individual A, on approximately February 5, 2022, the user of 708-XXX-3571 used the account to send threatening and stalking communications to Individual A. Specifically, the user of 708-XXX-3571 sent messages stating, among other things, “My gang is around bitch :)", “Car outside your moms [Individual G]”, and “Maybe she’s distracted good for me bitch.” Images of these messages are below.

Individual B



Individual B

Individual B



68. According to Inteliquent records, phone number 708-XXX-3571 is subscribed to and owned by TextMe. According to TextMe records, the account associated with 708-XXX-3571 was created on or about January 16, 2022 at approximately 8:13 p.m., and the registered email address was [Individual A's first and last name]33@gmail.com. According to Google records for [Individual A's first and last name]33@gmail.com, Google does not have records of any account holders for this email address.

69. According to TextMe records, phone number 708-XXX-3571 was assigned to the account on or about February 5, 2022 at 8:13 p.m. According to TextMe records, the registration IP for the account using phone number 708-XXX-3571 was 2607:fb90:e133:a993:891d:a7ec:32f9:7548. According to T-Mobile records, IP address 2607:fb90:e133:a993:891d:a7ec:32f9:7548 was registered to CANALE Phone 1 on January 16, 2022 at approximately 8:13 p.m.

**m. Subject Number 224-XXX-0989**

70. According to Individual A, beginning on or about June 5, 2022, Individual A began receiving harassing and threatening messages from phone number 224-XXX-0989. The user of phone number 224-XXX-0989 messaged Individual A saying “[Individual C] is really fucked”, “i talked to fbi”, and “little bitch ahha you guys are fucked they are waiting on warrents to”. Images of the messages are below.

Individual B

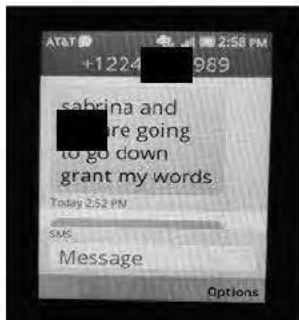
Individual C

Individual C



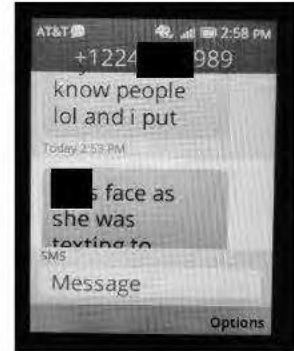
71. According to Individual B, beginning on or about June 5, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-0989. The user of phone number 224-XXX-0989 messaged Individual B saying “litle bitch lol ur next hunny dont worry the fbi hate you so much” and “fbi are waiting on warrents for ur house”.<sup>38</sup> Images of the messages are below.

Individual C



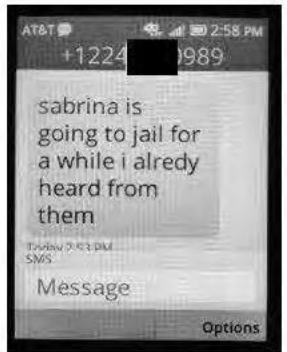
<sup>38</sup> On or about April 29, 2022, the government executed a search warrant at the residence of CANALE. It has not executed a search warrant at Individual B's residence.

Individual C



Individual C

Individual C



Individual B

Individual B



72. According to Inteliquent records, phone number 224-XXX-0989 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-0989 was created on or about June 5, 2022 at approximately 2:44 p.m., and the registered email address was [Individual B's first name][abbreviation of Individual B's last name]2121@gmail.com, believed to be a fictitious email.<sup>39</sup> According to TextMe records, phone number 224-XXX-0989 was assigned to the

<sup>39</sup> The government does not currently have subscriber information for the believed-fictitious email address. This is not a known email address for Individual B.

account on or about June 5, 2022 at 2:44 p.m. TextMe records did not list a withdrawal date. According to TextMe records, the registration IP for phone number 224-XXX-0989 used on or about June 5, 2022 at 2:44 p.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on June 5, 2022 at approximately 2:44 p.m.

73. TextMe phone number 224-XXX-0989 was created and used to send messages to Individuals after a search warrant was executed at CANALE's residence on or about April 29, 2022 and four of CANALE's phones were seized. According to TextMe returns, the device type used to create phone number 224-XXX-0989 was an "Octopus (11)" with UID 18293e27-d42a-39b1-bd05-0216bc2cc88c. Based on open-source searches, "Octopus" may be a device name associated with a Google Chromebook. According to an interview of Individual A on or about January 21, 2022, Individual A owns a Google Chromebook laptop which is used by her family members, and which the FBI did not seize during its April 29, 2022 search of the residence.

**n. Subject Number 224-XXX-5485**

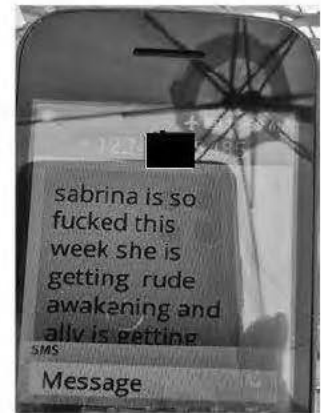
74. According to Individual B, beginning on or about July 3, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-5485. The user of phone number 224-XXX-5485 messaged Individual B saying "[CANALE] is fucked this week the fbi are finishing the case" and "[Individual C] is doing a whole lot of talking I hear everything she is saying".



The user of phone number 224-XXX-5485 also claims to have inside knowledge of the FBI's investigation. Images of the messages are below.



Individual C



Individual C



Individual C





Individual C



Individual C



Individual C's Friend



Individual C



Individual C



Individual C's Friends



75. According to Inteliquent records, phone number 224-XXX-5485 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-5485 was created on or about July 3, 2022 at approximately 10:20 a.m., and the registered email address was [a variation of Individual C's

name]95@gmail.com, a believed fictitious email.<sup>40</sup> According to TextMe records, phone number 224-XXX-5485 was assigned to the account on or about July 3, 2022 at 10:20 a.m. TextMe records did not list a withdrawal date.

76. According to TextMe records, the registration IP for phone number 224-XXX-5485 used on or about July 3, 2022 at 10:20 a.m. was 71.194.122.250. According to Comcast records, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on approximately July 3, 2022, at approximately 10:20 a.m.

77. According to TextMe returns, the device type used to create phone number 224-XXX-0989 was an "Octopus (11)" with UID 18293e27-d42a-39b1-bd05-0216bc2cc88c. As noted, based on open-source searches, "Octopus" may be a device name associated with a Google Chromebook; according to an interview of Individual A on or about January 21, 2022, Individual A owns a Google Chromebook laptop which is used by her family members.

**o. Subject Number 630-XXX-8320**

78. According to Individual A, beginning on or about May 31, 2022, Individual A began receiving harassing and threatening messages from phone number 630-XXX-8320. The user of phone number 630-XXX-8320 messaged Individual A, calling Individual A a "pussy" and claiming to know details of the FBI's investigation. Images of the messages are below.

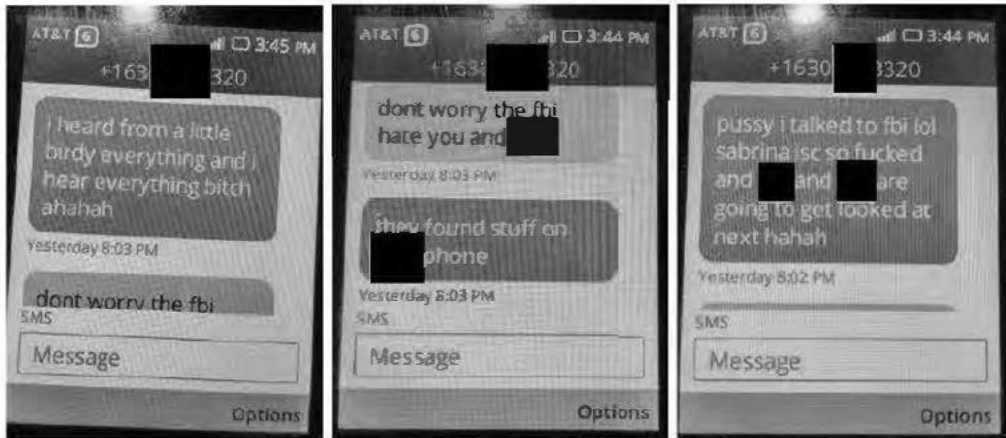
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<sup>40</sup> The government does not currently have subscriber information for this believed-fictitious email address. The email address is not a known email address for Individual C.



Individual B

Individual C



Individual B

Individual C

79. According to Inteliquent records, phone number 630 XXX 8320 is subscribed to and owned by Ooma<sup>41</sup>. According to Subsentio records, the account holding phone number 630-XXX-8320 was activated on June 1, 2022.<sup>42</sup> Subsentio records indicate phone number 630 XXX 8320 was assigned to the account on or about May 31, 2022 at 8:01 p.m. According to Subsentio records, the associated email address for phone number 630 XXX 8320 was [Individual A's last name].[Individual A's first name]@yahoo.com. According to emails exchanged with Individual A and local law enforcement on or about November 23, 2021, [Individual A's last name].[Individual A's first name]@yahoo.com is in fact Individual A's email address.

80. Talkatone phone number 630-XXX-8320 was created and used to send messages to Individuals after a search warrant was executed at CANALE's residence on or about April 29, 2022 and four of CANALE's phones were seized. According to Subsentio records, the account holding phone number 630-XXX-8320 was created

<sup>41</sup> According to Inteliquent records, phone number 630-XXX-8320 is owned by Ooma. When a records request was made to Ooma, the records were provided by Subsentio and list Talkatone as the application.

<sup>42</sup> Subsentio records do not give a timestamp for account activation. Records are in UTC.

with a “Google octopus octopus x86\_64” device with device ID 774d4277220e3ce6.<sup>43</sup> Based on open-source searches, “Octopus” may be a device name associated with a Google Chromebook. According to an interview of Individual A on or about January 21, 2022, Individual A owns a Google Chromebook laptop which is used by her family members.

## 2. Subject Numbers Connected to the IP Address for CANALE’s Home

### a. Subject Number 630-XXX-5452

81. According to Individual B, beginning on or about May 6, 2022, Individual B began receiving harassing and threatening messages from phone number 630-XXX-5452. The user of phone number 630-XXX-5452 messaged Individual B that “hahahahaha [Individual C] is next dont you worry” and “they (believed to be a reference to CANALE and Individual C) will sit in jail mark my fuckin words buck teeth bitch”. Images of the messages are below.



Individual C

<sup>43</sup> A records request was made to Google for device ID 774d4277220e3ce6. Google was unable to identify the device based on the device ID.



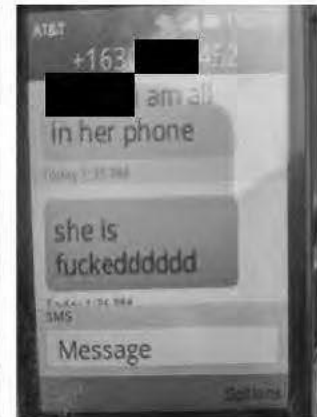
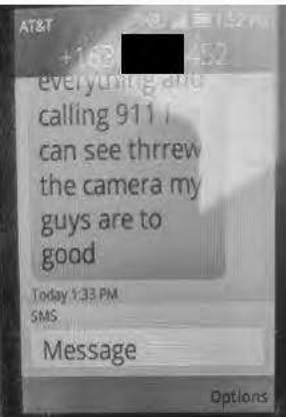
Individual C

Individual C



Individual C

Individual C



Unknown Individual

Individual C's Friend

Unknown Individual



Individual C's Friend

Unknown Individual

82. According to Bandwidth records, 630-XXX-5452 is subscribed to and owned by TextNow. According to TextNow records, email courtpas13@yahoo.com was the user of telephone number 630-XXX-5452 from approximately May 6, 2022 at 1:25 p.m. until May 9, 2022 at 10:59 p.m. According to Yahoo records, courtpas13@yahoo.com is not subscribed to any email account holder. According to TextNow records, the registration IP for courtpas13@yahoo.com used on or about May

6, 2022 at 1:24 p.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on May 6, 2022 at 1:24 p.m.

**b. Subject Number 224-XXX-0127**

83. According to Individual B, beginning on or about April 14, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-0127. The user of phone number 224-XXX-0127 messaged Individual B that "[Individual C] said you had a gun I'm in her little phone I see all her text messages" and "bitch throw that lame gun out hahah w we got better shit don't shoot ur self drunk". Images of the messages are below.



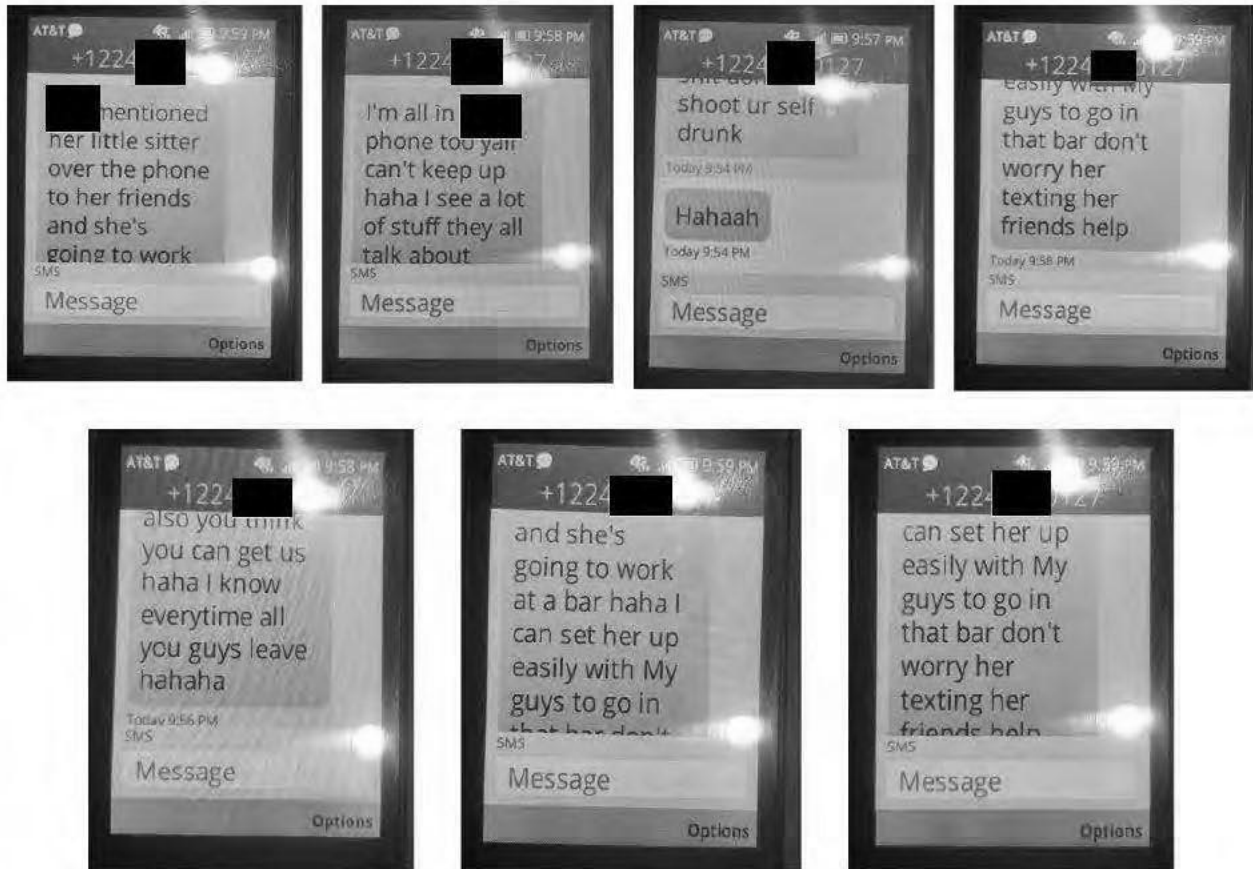
Individual C



Individual C



Individual C  
Individual F



84. According to Inteliquent records, phone number 224-XXX-0127 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-0127 was created on or about April 13, 2022, at approximately 9:51 p.m., and the registered email address was [Individual C's first name and Individual B's first name]44@gmail.com.<sup>44</sup> According to TextMe records, phone number 224-XXX-0127 was assigned to the account on or about April 13, 2022 at 9:51 p.m. TextMe records listed the withdrawal date as approximately April 28, 2022 at 7 p.m. According to TextMe records, the registration IP for phone number 224-XXX-0127

<sup>44</sup> The government does not currently have subscriber information for this believed-fictitious email address. The email address is not a known email address for Individual B.

used on or about April 13, 2022 at 9:51 p.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on April 13, 2022, at approximately 9:51 p.m.

**c. Subject Number 224-XXX-5071**

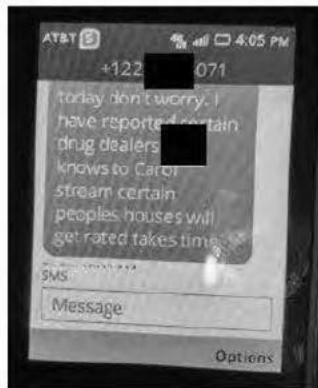
85. According to Individual B, beginning on or about April 15, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-5071. The user of phone number 224-XXX-5071 messaged Individual B saying "haha don't worry I have stuff In the works" and "I see everything [Individual C] sends LOL". Images of the messages are below.



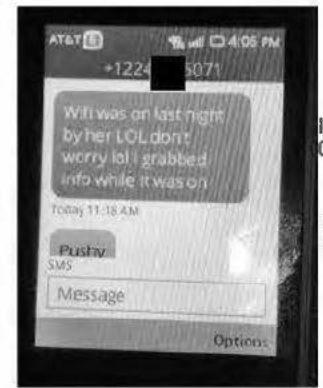
86. According to Individual A, beginning on or about April 15, 2022, Individual A began receiving harassing and threatening messages from phone number 224-XXX-5071. The user of phone number 224-XXX-5071 messaged



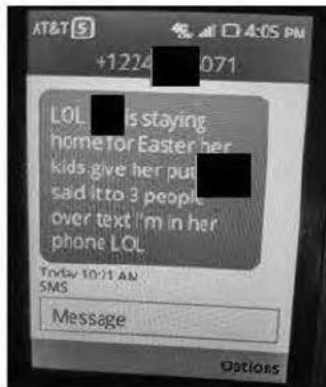
Individual B saying "LOL [Individual B] is staying home for Easter her kids give her put [Individual C] said it to 3 people over text I'm in her phone LOL" and "Wifi was on last night by her LOL don't worry lol I grabbed info while it was on." Images of the messages are below.\*



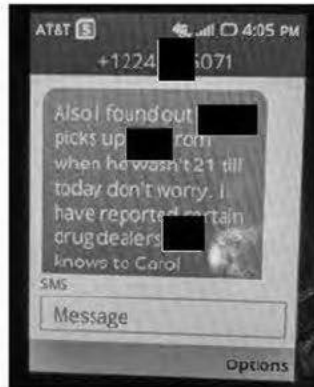
Individual C  
Individual C  
Individual C's  
Friend  
Individual B



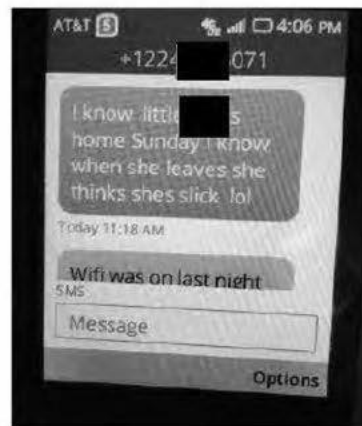
Individual C  
Unknown Individual



Individual B  
Individual C's  
Friend  
Individual C  
Individual C



Individual C  
Individual C's  
Boyfriend  
Individual F  
Individual C's  
Friend  
Individual C



Individual B

\* Based on information received during this investigation, the text messages in green above and later, below, were received messages (not sent messages), despite the grey messages that also appear as received messages.

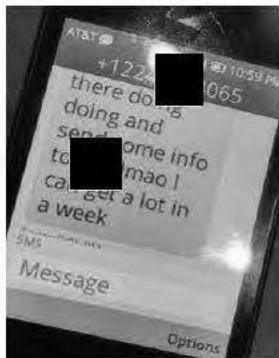


87. According to Inteliquent records, phone number 224-XXX-5071 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-5071 was created on or about April 15, 2022, at approximately 10:17 p.m., and the registered email address was [a variation of Individual B's first name]pal22@gmail.com. According to Google returns for [a variation of Individual B's first name]pal22@gmail.com, Google does not have records of any account holders for this email address.

88. According to TextMe records, phone number 224-XXX-5071 was assigned to the account on or about April 15, 2022 at 10:17 a.m. TextMe records listed the withdrawal date as approximately April 30, 2022 at 7 p.m. According to TextMe records, the registration IP for phone number 224-XXX-5071 used on or about April 15, 2022 at 10:17 a.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on April 15, 2022 at approximately 10:17 a.m.

**d. Subject Number 224-XXX-4065**

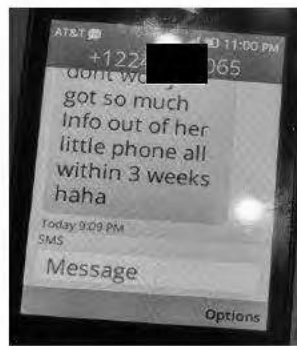
89. According to Individual B, beginning on or about April 14, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-4065. The user of phone number 224-XXX-4065 messaged Individual B saying "Don't worry hunny [Individual C] gave out mord into today to her friends haha about Easter and her little friend Julia I saw it all" and "LMFAO my guys will KILL YOU". Images of the messages are below.



Individual F



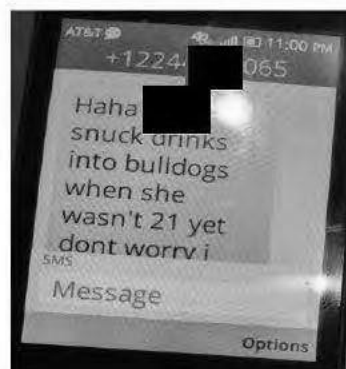
Individual C



Individual C

Individual C

Individual F



Individual C

90. According to Inteliquent records, phone number 224-XXX-4065 is subscribed to and owned by TextMe. According to TextMe records, the account associated with 224-XXX-4065 was created on or about April 14, 2022 at approximately 9:03 p.m., and the registered email address was [a variation of Individual C's first name][an abbreviation of Individual C's last name]22@gmail.com. According to Google returns, [a variation of Individual C's first name][an abbreviation of Individual C's last name]22@gmail.com, Google does not have records of any account holders for this email address.

91. According to TextMe records, phone number 224-XXX-4065 was assigned to the account on or about April 14, 2022 at 9:03 p.m. TextMe records listed the withdrawal date as approximately April 29, 2022 at 7 p.m. According to TextMe records, the registration IP for phone number 224-XXX-4065 used on or about April 14, 2022 at 9:03 p.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on April 14, 2022 at approximately 9:03 p.m.

**e. Subject Number 224-XXX-3125**

92. According to Individual B, beginning on or about April 16, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-3125. The user of phone number 224-XXX-3125 messaged Individual B saying "I hear everything I I see everything [Individual C] says lmaoo" and "Even when you try to keep it a secrete ur daughter doesnt haah". Images of the messages are below.





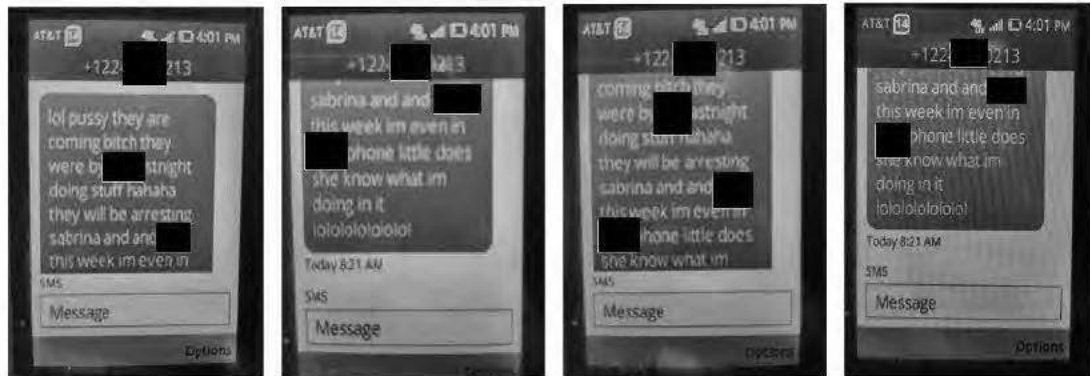
93. According to Inteliquent records, phone number 224-XXX-3125 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-3125 was created on or about April 16, 2022 at approximately 11:19 p.m., and the registered email address was [a variation of Individual B's first name][an abbreviation of Individual B's last name]3@gmail.com. According to Google returns for [a variation of Individual B's first name][an abbreviation of Individual B's last name]3@gmail.com, Google does not have records of any account holders for this email address.

94. According to TextMe records, phone number 224-XXX-3125 was assigned to the account on or about April 16, 2022 at 11:19 p.m. TextMe records did not list a withdrawal date. According to TextMe records, the registration IP for phone number 224-XXX-3125 used on or about April 16, 2022 at 11:19 p.m. was

71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on April 16, 2022 at approximately 11:19 p.m.

**f. Subject Number 224-XXX-0213**

95. According to Individual A, beginning on or about May 7, 2022, Individual A began receiving harassing and threatening messages from phone number 224-XXX-0213. The user of phone number 224-XXX-0213 messaged Individual A saying "lol pussy they are coming bitch they were by [Individual B] lastnight doing stuff hahaha they will be arresting sabrina and [Individual C] this week". Images of the messages are below.



96. According to Inteliquent records, phone number 224-XXX-0213 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-0213 was created on or about May 7, 2022 at approximately 8:08 a.m., and the registered email address was [a variation of Individual C's first name and Individual C's last name]44@gmail.com.<sup>45</sup>

<sup>45</sup> The government does not currently have subscriber information for the believed-fictitious email address. It is not a known email address for Individual C.



97. According to TextMe records, phone number 224-XXX-0213 was assigned to the account on or about May 7, 2022 at 8:08 a.m. TextMe records did not list a withdrawal date. According to TextMe records, the registration IP for phone number 224-XXX-0213 used on or about May 7, 2022 at 8:08 a.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on May 7, 2022 at approximately 8:08 a.m.

98. TextMe phone number 224-XXX-0213 was created and used to send messages to Individuals after a search warrant was executed at CANALE's residence and four of CANALE's phones were seized. According to TextMe returns, the device type used to create phone number 224-XXX-0213 was an "Octopus (9)" with UID 18293e27-d42a-39b1-bd05-0216bc2cc88c. Based on open-source searches, "Octopus" may be a device name associated with a Google Chromebook. According to an interview of Individual A on or about January 21, 2022, Individual A owns a Google Chromebook laptop which is used by her family members.

**g. Subject Number 224-XXX-1893**

99. According to Individual A, beginning on or about July 25, 2022, Individual B began receiving harassing and threatening messages from phone number 224-XXX-1893. The user of phone number 224-XXX-1893 messaged Individual A saying "I am downloading text apps with [Individual C's] iphone and icloud email", "fbi told me you have a meeting and [CANALE] and [Individual C] are

bot fucked hah”, and “i will use her icloud account dont worry and trust me i have [CANALE’s].<sup>46</sup> Images of the messages are below.

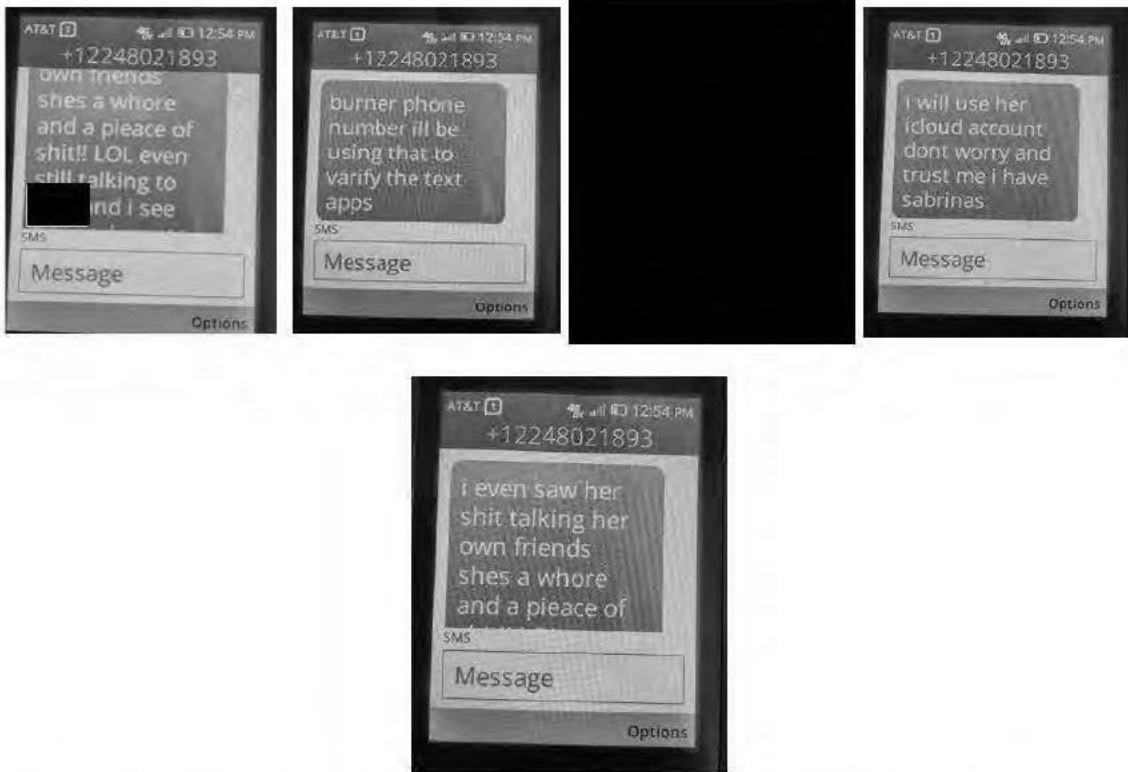


Individual C  
Individual C

Individual C's  
Friend  
Individual C's  
Friend

<sup>46</sup> On or about July 25, 2022, the government had a meeting with CANALE and her lawyer. That meeting was scheduled between the assigned Assistant U.S. Attorney and CANALE's attorney. I believe these messages and the others listed in this affidavit—ones that imply CANALE will be charged or imply access to information about the investigation that would be known by CANALE or likely be known by her through her lawyer—were made by CANALE in an attempt to make it appear as though she is being falsely accused and Individual D or another are behind the messages.

Individual C's  
Friend



100. According to Inteliquent records, phone number 224-XXX-1893 is subscribed to and owned by TextMe. According to TextMe records, the account holding 224-XXX-1893 was created on or about July 25, 2022, at approximately 7:54 a.m., and the registered email address was [a variation of Individual B's first name and Individual A's last name]5678@gmail.com.<sup>47</sup>

101. According to TextMe records, phone number 224-XXX-1893 was assigned to the account on or about July 25, 2022 at 7:54 a.m. TextMe records did not list a withdrawal date. According to TextMe records, the registration IP for phone number 224-XXX-1893 used on or about July 25, 2022 at 7:54 a.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250 was registered to

<sup>47</sup> The government does not currently have subscriber information for the believed-fictitious email address. The email address is not a known email address for Individual A.

Individual A at Individual A and CANALE's home address on July 25, 2022 at 7:56 a.m.

**h. Subject Number 630-XXX-5736**

102. According to Individual C, beginning on or about September 13, 2022, Individual C began receiving harassing and threatening messages from phone number 630-XXX-5736. The user of phone number 630-XXX-5736 messaged Individual C calling Individual C a "whore" and claimed to be "in" multiple Individuals' phones. Images of the messages are below.





Individual C's Boyfriend

Individual F

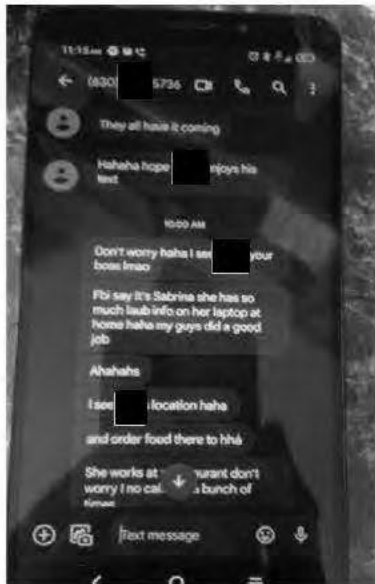
Individual C's Friend

Individual C's Boyfriend



Individual B's Friends

Individual B's Friend



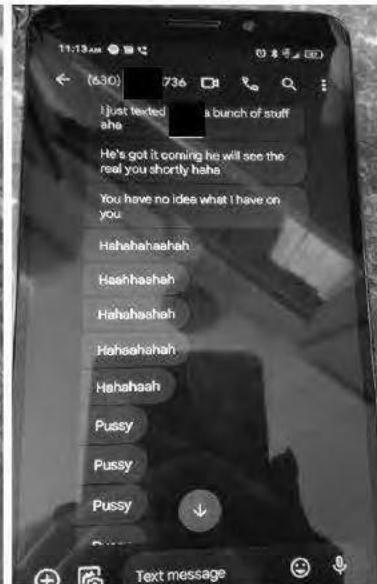
Individual C's Friend

Individual C's Boyfriend

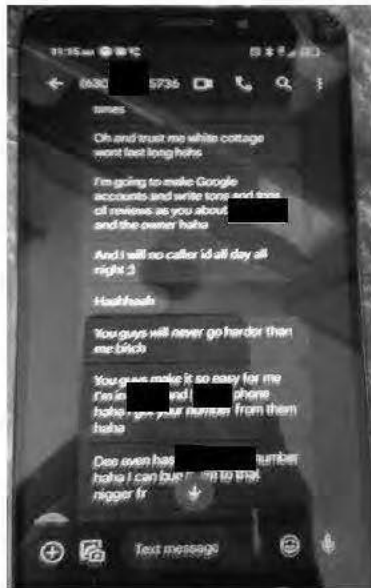
Individual C's Employer

Individual B's Friend

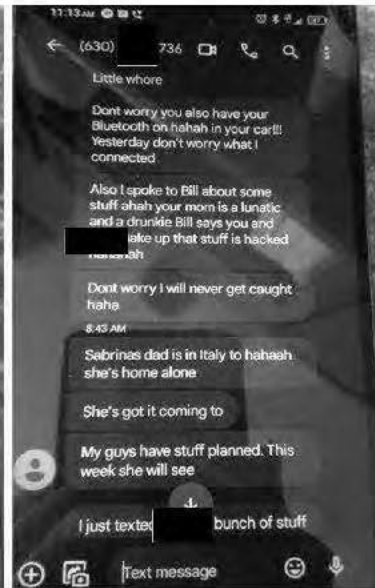
Individual F



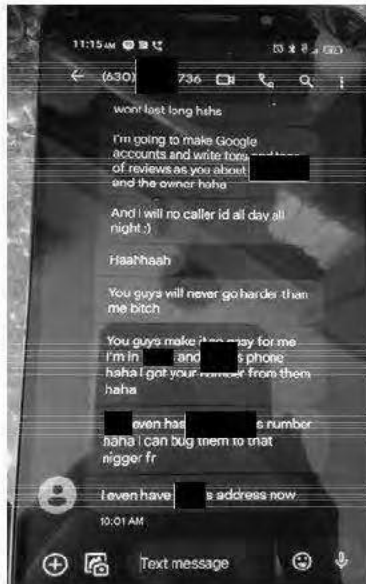
Individual C's Boyfriend



Individual F

Individual C's  
BoyfriendIndividual C's  
Friends

Individual A

Individual C's  
Boyfriend

Manager A

Individual F

Individual C's  
Boyfriend

Individual F

Individual C's  
FriendsIndividual C's  
FriendIndividual C's  
Friend

Individual F

Individual C's  
Boyfriend

103. According to Inteliquent records, phone number 630-XXX-5736 is subscribed to and owned by TextMe. According to TextMe records, the account holding 630-XXX-5736 was created on or about September 13, 2022 at approximately 8:37 a.m., and the registered email address was jebbyfis22@gmail.com.<sup>48</sup>

<sup>48</sup> The government does not currently have subscriber information for the believed-fictitious email address. It is not a known email address for any Individual in this investigation.



104. According to TextMe records, phone number 630-XXX-5736 was assigned to the account on or about September 13, 2022 at approximately 8:37 a.m. TextMe records listed the withdrawal date as approximately September 28, 2022 at 7 p.m. According to TextMe records, the registration IP for phone number 630-XXX-5736 used on or about September 13, 2022 at 8:37 a.m. was 174.240.251.1<sup>49</sup> which is owned by Verizon. According to Verizon records, CANALE Phone 5 (5805) accessed IP address 174.240.251.1 on September 13, 2022 at approximately 5:24 a.m. through 10:53 a.m.

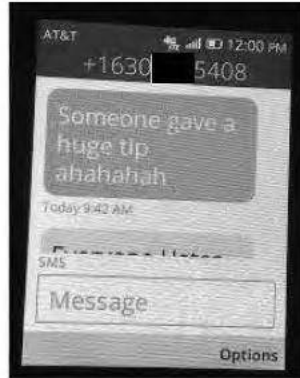
**i. Subject Number 630-XXX-5408**

105. According to Individual A, beginning on or about September 13, 2022, Individual A began receiving harassing and threatening messages from phone number 630-XXX-5408. The user of phone number 630-XXX-5408 messaged Individual A, commented on the location of Individual A's husband and stated that "shit will get ugly real soon". Images of the messages are below.

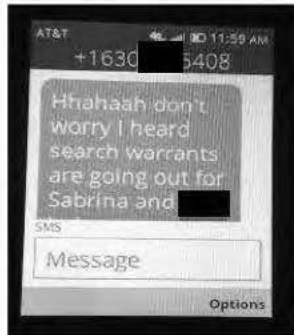


<sup>49</sup> Verizon IP address 174.240.251.1 is a Natting Router IP. According to Verizon records, a Natting Router IP can have many users at the same time. Verizon provided records detailing all phone numbers that utilized the Natting Router IP during the timeframe specified in the subpoena.

Individual C



Individual C



Individual C

Individual C

Individual C



Individual C

Individual C

Individual B

Individual C's  
Boyfriend



Individual B's  
Friend



Individual C

Individual C's  
BoyfriendIndividual B's  
Friend

106. According to Inteliquent records, phone number 630-XXX-5408 is subscribed to and owned by TextMe. According to TextMe records the account holding 630-XXX-5408 was created on or about September 13, 2022 at approximately 9:39 a.m., and the registered email address was jabba[a variation of Individual D's first name]22@gmail.com.<sup>50</sup>

107. According to TextMe records, phone number 630-XXX-5408 was assigned to the account on or about September 13, 2022 at approximately 9:39 a.m. TextMe records listed the withdrawal date as approximately September 28, 2022 at 7 p.m. According to TextMe records, the registration IP for phone number 630-XXX-5408 used on or about September 13, 2022 at 9:39 a.m. was 174.240.251.1<sup>51</sup> which is

<sup>50</sup> The government does not currently have subscriber information for the believed-fictitious email address. It is not a known email address for any Individual in this investigation.

<sup>51</sup> Verizon IP address 174.240.251.1 is a Natting Router IP.

owned by Verizon. According to Verizon records, CANALE Phone 5 (5805) accessed IP address 174.240.251.1 on September 13, 2022 from approximately 5:24 a.m. through 10:53 a.m.

**j. Subject Number 630-XXX-4075**

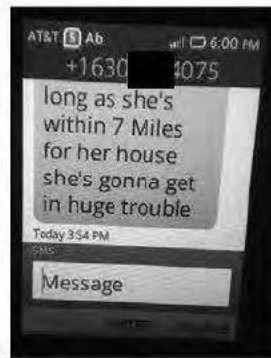
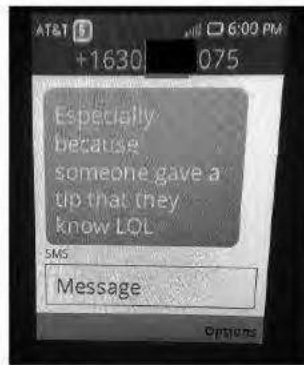
108. According to Individual A, beginning on or about September 15, 2022, Individual A began receiving harassing and threatening messages from phone number 630-XXX-4075. The user of phone number 630-XXX-4075 messaged Individual A, saying “U guys are fuckeddd” and “It’s going to get ugly with [Individual B] and [Individual C] real soon”. Images of the messages are below.







Individual C



Individual B

109. According to Inteliquent records, phone number 630-XXX-4075 is subscribed to and owned by TextMe. According to TextMe records, the account holding 630-XXX-4075 was created on or about September 15, 2022 at approximately 3:04 p.m., and the registered email address was [Individual B's first name]ieeeee22@gmail.com.<sup>52</sup>

110. According to TextMe records, phone number 630-XXX-4075 was assigned to the account on or about September 15, 2022 at approximately 3:06 p.m. TextMe records listed the withdrawal date as October 8, 2022 at approximately 7:00 p.m. According to TextMe records, the registration IP for phone number 630-XXX-4075 used on or about September 15, 2022 at 3:04 p.m. was 174.240.234.203<sup>53</sup> which is owned by Verizon. According to Verizon records, **CANALE Phone 5** (5805) accessed IP address 174.240.234.203 on September 15, 2022 at approximately 3:05 p.m. through 5:07 p.m.

<sup>52</sup> The government does not currently have subscriber information for the believed-fictitious email address. It is not a known email address for Individual B.

<sup>53</sup> Verizon IP address 174.240.234.203 is a Natting Router IP.

111. According to TextMe records, the last user IP address for phone number 630-XXX-4075, used on or about September 15, 2022 at approximately 3:49 p.m., was 174.240.251.95<sup>54</sup> which is owned by Verizon. According to Verizon records, **CANALE Phone 5** (5805) used IP address 174.240.251.95 on September 15, 2022 from approximately 3:49 p.m. until 5:10 p.m.

**k. Subject Number 630-XXX-5198**

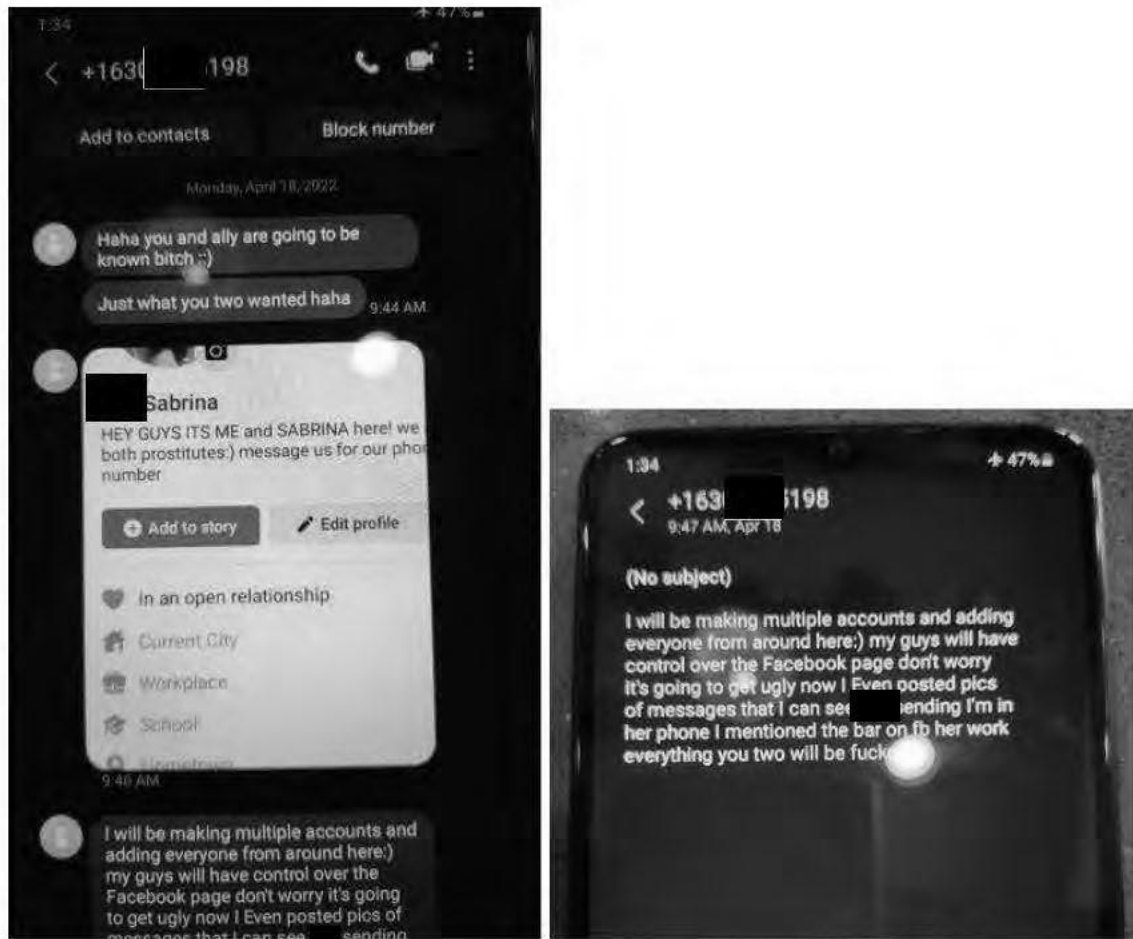
112. According to CANALE, beginning on or about April 18, 2022, CANALE began receiving harassing and threatening messages from phone number 630-XXX-5198. The user of phone number 630-XXX-5198 messaged CANALE that the user “Will be making multiple accounts and adding everyone from around here:) my guys will have control over the Facebook page don’t worry it’s going to get ugly now.” The user of phone number 630-XXX-5198 attached a screenshot of a Facebook page with profile name “Ally Sabrina” (“Facebook Profile 1”) claiming Individual C and CANALE were “prostitutes.” Images of the messages are below.

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<sup>54</sup> Verizon IP address 174.240.251.95 is a Natting Router IP.



Individual C



113. According to Bandwidth records, phone number 630-XXX-5198 is subscribed to and owned by Pinger, a voice-messaging software company. According to Pinger's website, Pinger is located in California. Based on my experience with Pinger, Pinger does not require email, telephone, or another form of verification before a user can access and use and Pinger number.

114. According to Pinger records, phone number 630-XXX-5198 was used by account ID 1423881393, and the creation date was listed as approximately April 18, 2022 at 9:43 a.m. Pinger records indicate phone number 630-XXX-5198 was assigned to the account on April 18, 2022 at approximately 9:43 a.m., with a registered email

address of [a variation of Individual C's first name and Individual C's last name]66@gmail.com.<sup>55</sup>

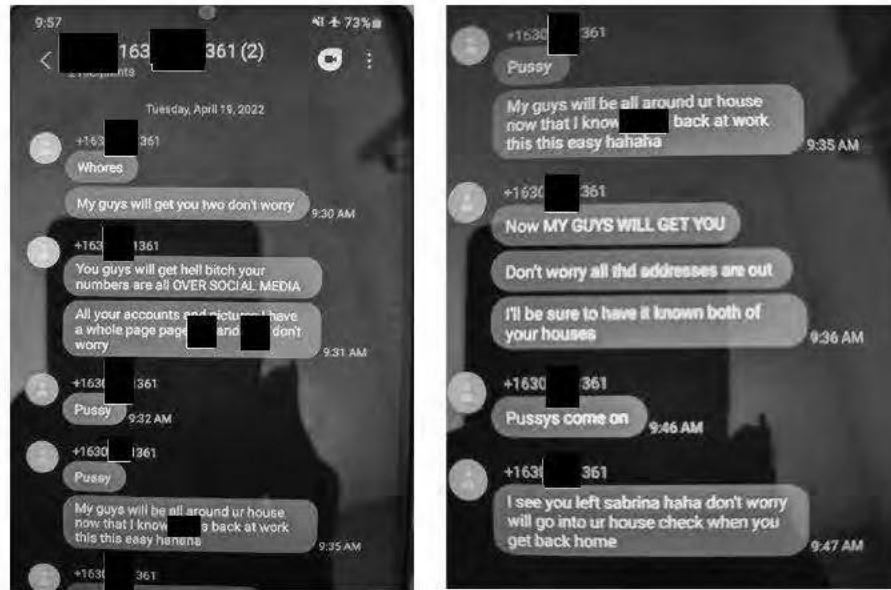
115. According to Pinger records, phone number 630-XXX-5198 was used by a Google Android device. According to an interview of CANALE on April 19, 2022, CANALE was using a Google Android device at the time. According to Pinger records, the registration IP for phone number 630-XXX-5198 used on or about April 18, 2022 at 9:43 a.m. was 71.194.122.250. According to Comcast records, IP address 71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on April 18, 2022 at approximately 9:43 a.m.

**l. Subject Number 630-XXX-1361**

116. According to CANALE, beginning on or about April 19, 2022, CANALE and Individual C began receiving harassing and threatening messages from phone number 630-XXX-1361. The user of phone number 630-XXX-1361 messaged CANALE and Individual C calling them "whores" and said "My guys will get you two don't worry" and that "my guys will be all around ur house now that I know [Individual H] is back at work this this easy hahaha." Images of the messages are below.

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<sup>55</sup> The government does not currently have subscriber information for the believed-fictitious email address. It is not a known email address for Individual C.



Individual C  
Individual C's  
Friend

Individual H

Individual H

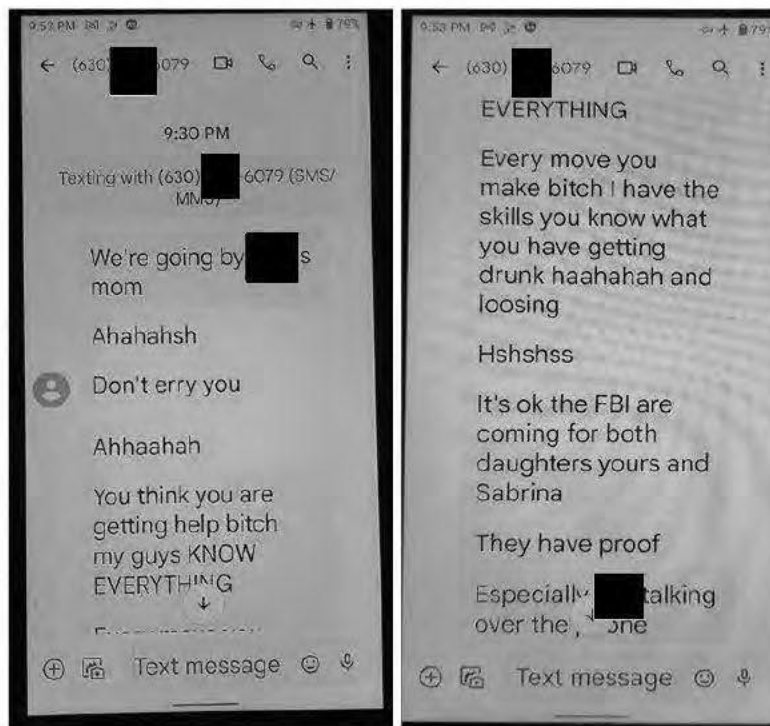
117. According to Bandwidth records, phone number 630-XXX-1361 is subscribed to and owned by Pinger. According to Pinger records, phone number 630-XXX-1361 was used by account ID 1424185021, and the creation date was listed as approximately April 19, 2022 at 9:26 a.m. Pinger records indicate phone number 630-XXX-1361 was assigned to the account on April 19, 2022 at 9:27 a.m., with a registered email address of hockeyy6767@gmail.com. According to Google returns for hockeyy6767@gmail.com, Google does not have records of any account holders for this email address.

118. According to Pinger records, phone number 630-XXX-1361 was used by a Google Android device. According to an interview of CANALE on April 19, 2022, CANALE was using a Google Android device at the time. According to Pinger records, the registration IP for phone number 630-XXX-1361 used on or about April 19, 2022 at 9:26 a.m. was 71.194.122.250. According to Comcast, IP address 71.194.122.250

was registered to Individual A at Individual A and CANALE's home address on April 19, 2022 at approximately 9:26 a.m.

**m. Subject Number 630-XXX-6079**

119. According to Individual B, on or about October 13, 2022 between 8:45 p.m. and 10:00 p.m., Individual B received harassing and threatening messages from phone number 630-XXX-6079. The user of phone number 630-XXX-6079 messaged Individual B, stating "You think you are getting help bitch my guys KNOW EVERYTHING" and "the FBI are coming for both daughters yours and [CANALE]". Images of the messages are below.

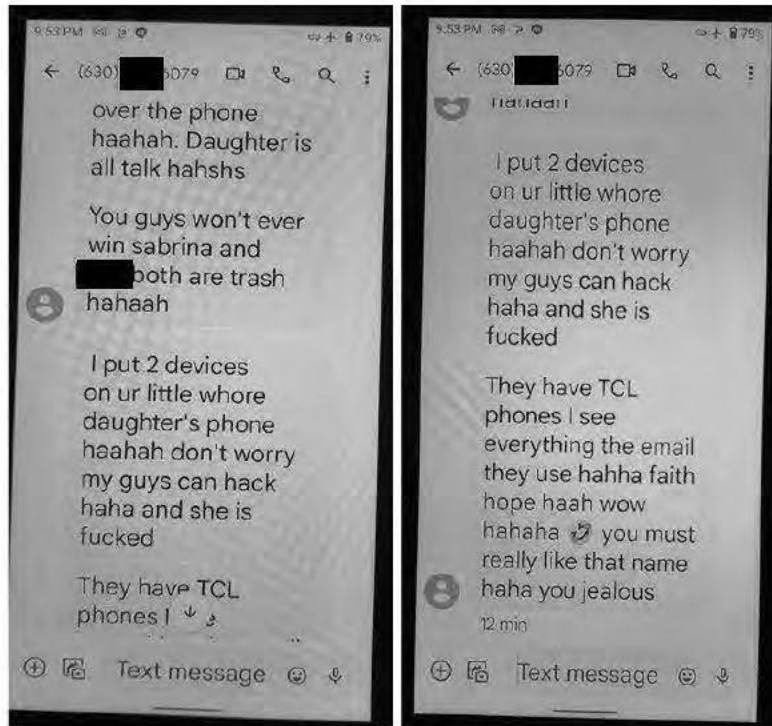


Individual A

Individual C



Individual C



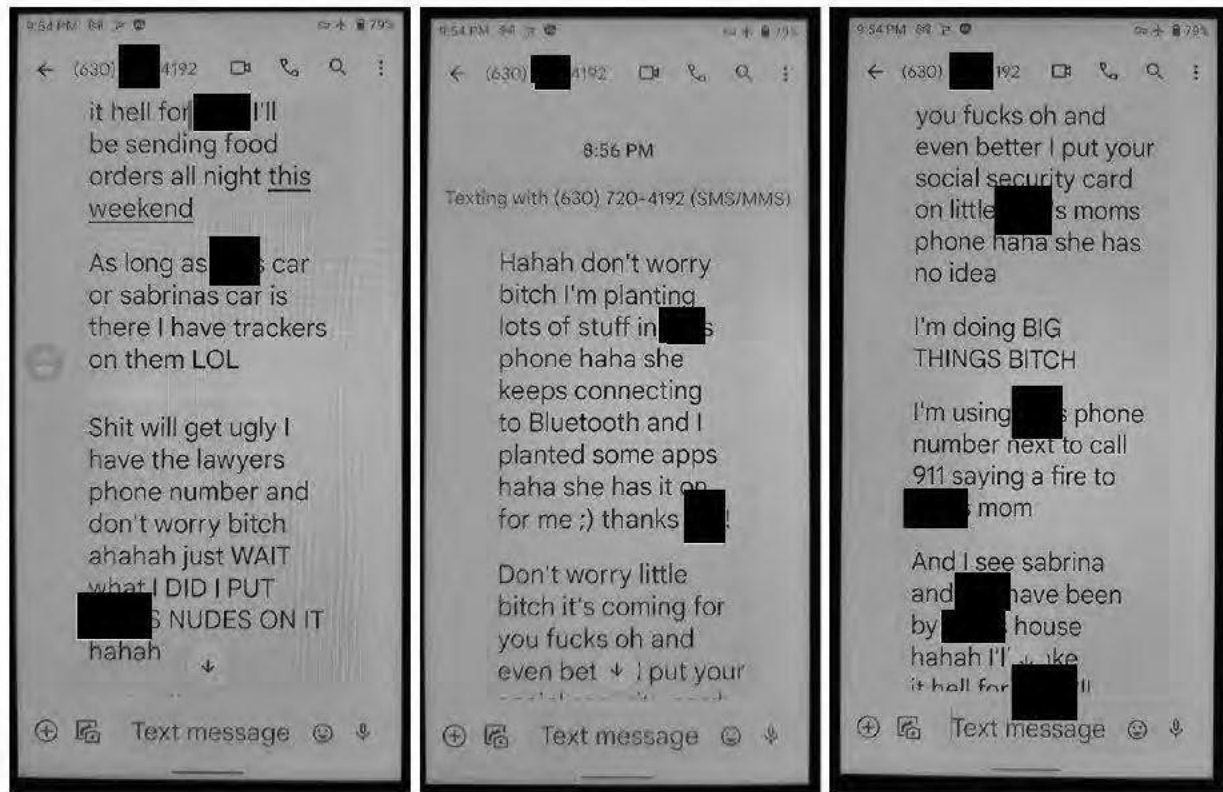
120. According to Bandwidth records, phone number 630-XXX-6079 is subscribed to and owned by Pinger. According to Pinger records, phone number 630-XXX-6079 was used by account ID 1517694661, and the creation date was listed as approximately October 13, 2022 at 8:55 p.m. Pinger records indicate phone number 630-XXX-6079 was assigned to the account on or about October 13, 2022 at 9:11 p.m., with a registered email address of robbingill22@gmail.com. According to Google records for robbingill22@gmail.com, Google does not have records of any account holders for this email address.

121. According to Pinger records, phone number 630-XXX-6079 was used by a Google Android device. According to Verizon records, CANALE was using a Google Android device at the time. According to Pinger records, the registration IP for phone number 630-XXX-6079 used on or about October 13, 2022 at 8:55 p.m. was

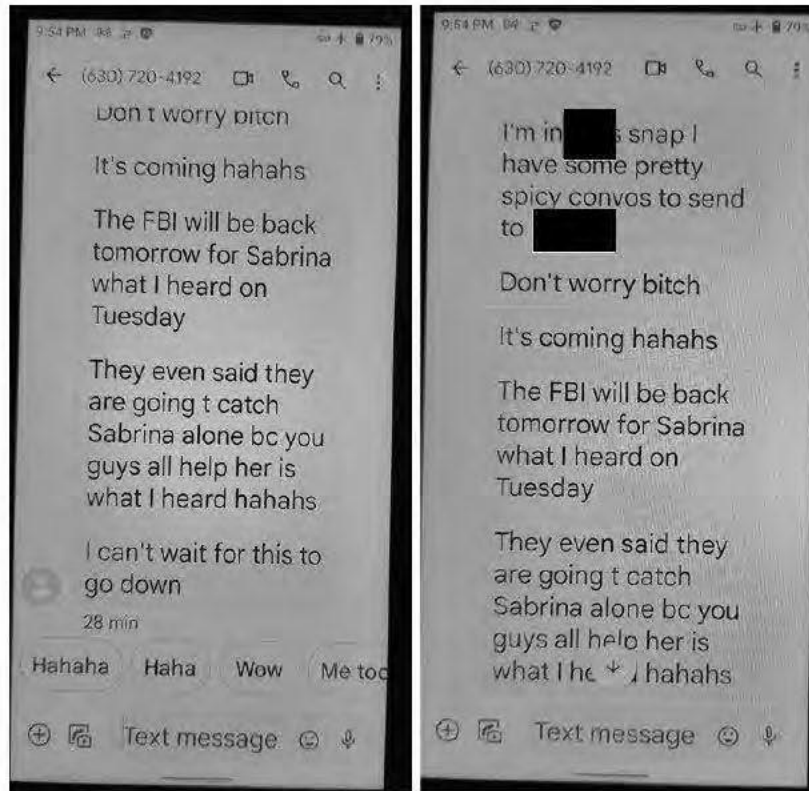
174.240.253.84 which is owned by Verizon. According to Verizon returns, CANALE was using a Verizon device at this time. According to Verizon records, **CANALE Phone 5** (5805) accessed IP address 174.240.253.84 on or about October 13, 2022 at approximately 8:40 p.m. to October 14, 2022 at approximately 12:12 p.m.

**n. Subject Number 630-XXX-4192**

122. According to Individual B, on or about October 13, 2022 between 8:45 p.m. and 10:00 p.m. Individual B received harassing and threatening messages from phone number 630-XXX-4192. The user of phone number 630-XXX-4192 messaged Individual B, stating “Don’t worry little bitch I’m coming for you fucks” and “I’m using [Individual C’s] phone number next to call 911 saying a fire to [Individual A’s] mom’s (Individual G) house”. Images of the messages are below.







Individual C

Individual C's  
Boyfriend

123. According to Bandwidth records, phone number 630-XXX-4192 is subscribed to and owned by Pinger. According to Pinger records, phone number 630-XXX-4192 was used by account ID 1517694661 with the creation date listed as October 13, 2022 at approximately 8:55 p.m. Pinger records indicate phone number 630-XXX-4192 was assigned to the account on October 13, 2022 at 8:55 p.m. until 9:11 p.m., with a registered email address of robbingill22@gmail.com. According to Google records for robbingill22@gmail.com, Google does not have records of any account holders for this email address.

124. According to Pinger records, phone number 630-XXX-4192 was used by a Google Android device. According to Verizon records, CANALE was using a Google Android device at the time. According to Pinger records, the registration IP for phone number 630-XXX-4192 used on or about October 13, 2022 at 8:55 p.m. was

174.240.253.84, which is owned by Verizon. According to Verizon returns, CANALE was using a Verizon device at this time. According to Verizon records, **CANALE Phone 5** (5805) accessed IP address 174.240.253.84 on or about October 13, 2022 at approximately 8:40 p.m. to October 14, 2022 at approximately 12:12 p.m.<sup>56</sup>

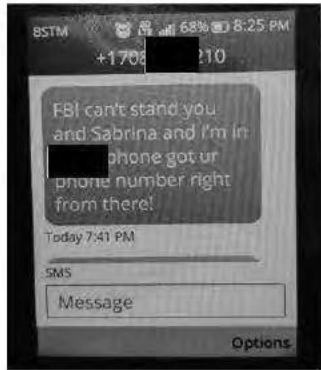
**o. Subject Number 708-XXX-6210**

125. According to Individual C, beginning on or about June 20, 2022, Individual C began receiving harassing and threatening messages from phone number 708-XXX-6210. The user of phone number 708-XXX-6210 messaged Individual C, calling Individual C a “loser ass bitch” and stating “FBI can’t stand you and [CANALE] and I’m in [Individual F] phone got ur number right from there!”. Images of the messages are below.

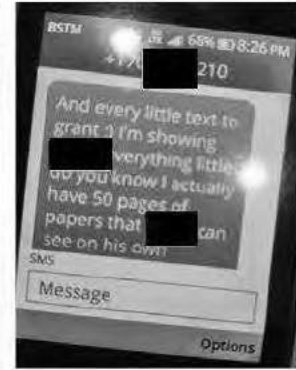


<sup>56</sup> Verizon IP address 174.240.253.84 is a Natting Router IP.



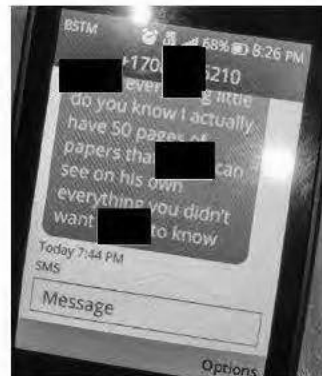
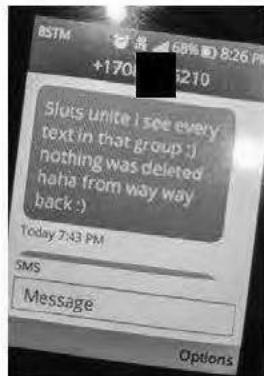


Individual F



Individual C's Boyfriend

Individual C's Boyfriend

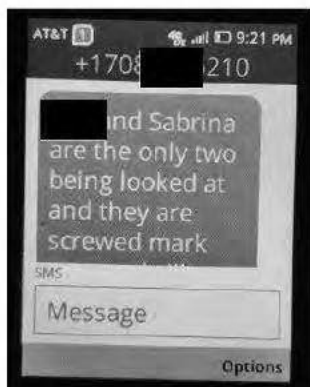


Individual C's Boyfriend

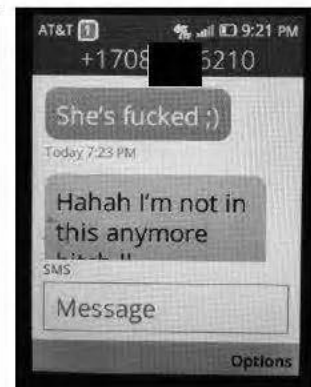
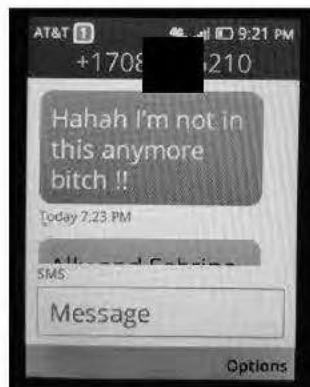
Individual C's Boyfriend

Individual C's Boyfriend

126. According to Individual A, beginning on or about June 20, 2022, Individual A began receiving harassing and threatening messages from phone number 708-XXX-6210. The user of phone number 708-XXX-6210 messaged Individual A saying “[Individual C] and [CANALE] are the only two being looked at and they are screwed mark my words !!!!” and calling Individual A a “pussy”. Images of the messages are below.



Individual C



Individual C



Individual B

Individual B

Individual C

127. According to Inteliquent records, phone number 708-XXX-6210 is subscribed to and owned by Talktone.<sup>57</sup> According to an open source search, Dingtone is headquartered in San Jose, California. Based on my experience with Dingtone, Dingtone does not require user verification through email or text.

128. According to Dingtone records, the account holding phone number 708-XXX-6210 was first logged into on or about June 20, 2022 at 7:20 p.m. and last logged into on or about June 20, 2022 at 7:47 p.m. According to Dingtone records, the registration IP for phone number 708-XXX-6210 used on or about June 20, 2022 at 7:20 p.m. until 7:47 p.m. was 71.194.122.250. According to Comcast, IP address

<sup>57</sup> According to Inteliquent records, phone number 708-XXX-6210 is owned by Talktone. When a records request was made to lawenforcement@talktone.me, a response was received from laylay.zhu@dingtone.me.

71.194.122.250 was registered to Individual A at Individual A and CANALE's home address on June 20, 2022 at approximately 7:20 p.m. through 7:47 p.m.

### **C. ADDITIONAL FACTS CONNECTING CANALE TO THE SUBJECT OFFENSE**

129. In addition to the connection to CANALE devices, accounts, and IP addresses discussed above, additional evidence implicates CANALE as the sender of the threatening and harassing messages. This includes: (1) anonymous calls made from her devices; (2) her use of the subject texting applications; (3) false 911 calls made by CANALE; and (4) her use of Facebook accounts to further the harassment. During the investigation, several claims regarding CANALE's purported innocence, and another's purported culpability, have been made to investigators, some of which are also briefly summarized below.

#### **1. Anonymous/Blocked Calls**

130. Individuals in the case, including Individual A, C, and others, have reported to the FBI that they have received repeated unwanted phone calls from blocked numbers—or numbers for which the receiving phone does not identify the caller's telephone number—over the previous year, often in rapid succession and generally with no person speaking on the calling line.

131. A review of toll records provided by T-Mobile associated with CANALE Phone 1 and CANALE Phone 2 show several instances in which the phone dialed \*67 before calling or texting the Individuals. Based on my training and experience, a common way to obfuscate a calling number is to add “\*67” before typing in the telephone number being called. When “\*67” is added before a telephone number, the

receiving user may see “Private Number” or another masking title as the calling number rather than the true identity or phone number of the calling number.

132. Specifically, the records show:

a. On November 8, 2021 at approximately 4:29:09 p.m., 4:48:39 p.m., 4:48:58 p.m., 7:31:13 p.m., 7:31:53 p.m., 7:32:20 p.m., 7:32:44 p.m., 7:37:07 p.m., 7:47:05 p.m., 8:26:47 p.m., 8:27:12 p.m., 8:33:01 p.m., 8:44:57 p.m., 8:54:53 p.m., and 8:55:16 p.m., CANALE Phone 2 called Individual A using \*67 before Individual A’s phone number.

b. On November 10, 2021 at 2:40:44 p.m., 2:43:48 p.m., 2:50:59 p.m., 2:59:24 p.m., 2:59:43 p.m., 2:59:56 p.m., 3:00:09 p.m., 3:00:35 p.m., 3:00:52 p.m., 3:01:06 p.m., 3:01:28 p.m., 3:02:03 p.m., 3:07:13 p.m., 6:46:42 p.m., 6:47:24 p.m., 8:22:12 p.m., 8:22:58 p.m., 8:23:10 p.m., 8:23:25 p.m., 8:23:42 p.m., 8:23:54 p.m., 8:24:07 p.m., 8:24:22 p.m., 8:24:39 p.m., 8:41:55 p.m., 8:42:26 p.m., 8:42:54 p.m., 8:43:10 p.m., 8:43:32 p.m., 8:43:47 p.m., 8:44:42 p.m., 8:44:53 p.m., 8:45:08 p.m., 8:45:23 p.m., 8:45:39 p.m., and 8:45:51 p.m., CANALE Phone 2 called Individual C using \*67 before Individual C’s phone number.

133. According to T-Mobile records, CANALE Phone 1 called other Individuals (those listed in this affidavit and others) using \*67 on approximately 26 occasions between May 21, 2021 and August 27, 2021.

134. According to T-Mobile records, CANALE Phone 2 called other Individuals (those listed in this affidavit and others) using \*67 on approximately 406 occasions between October 14, 2021 and November 23, 2021.



135. According to T-Mobile records, CANALE Phone 1 called other Individuals (those listed in this affidavit and others) using \*67 on approximately 327 occasions between December 22, 2021 and February 7, 2022.

136. A review of toll records provided by Verizon associated with **CANALE Phone 5** show several instances in which the phone dialed \*67 before calling or texting the Individuals.

137. Specifically, the records show:

a. On September 15, 2022 at approximately 4:32 p.m., 4:33 p.m., 4:34 p.m., 4:35 p.m., 4:36 p.m., 4:38 p.m., 4:39 p.m., and 4:40 p.m. **CANALE Phone 5** (5805) called Individual A using \*67 before Individual A's phone number.

b. On September 13, 2022 at approximately 9:14 a.m., 9:15 a.m., 9:18 a.m., 9:21 a.m., 9:24 a.m., 9:29 a.m., 9:37 a.m., and 9:44 a.m. **CANALE Phone 5** (5805) called Individual C using \*67 before Individual C's phone number.

c. On September 16, 2022 at approximately 8:49 a.m., 8:50 a.m., 8:51 a.m., 8:52 a.m., 8:53 a.m., 8:54 a.m., 8:55 a.m., 9:05 a.m., 9:07 a.m., and 9:16 a.m. **CANALE Phone 5** (5805) called Individual C using \*67 before Individual C's phone number.

d. On October 7, 2022 at approximately 1:06 p.m., 1:07 p.m., 1:08 p.m., 1:12 p.m., 1:13 p.m., 1:14 p.m., 1:15 p.m., 1:16 p.m., 1:17 p.m., 1:20 p.m., 1:22 p.m., 1:23 p.m., 1:24 p.m., 1:25 p.m., 1:26 p.m., 1:27 p.m., 1:18 p.m., 1:29 p.m., 1:30 p.m., 1:31 p.m., 1:32 p.m., 1:33 p.m., 1:34 p.m., 1:35 p.m., 1:36 p.m., 1:37 p.m., 1:38

p.m., 1:39 p.m., 1:40 p.m., 1:55 p.m., and 1:56 p.m. **CANALE Phone 5** (5805) called Business A in Hanover Park using \*67 before Business A's phone number.

e. According to Verizon records, **CANALE Phone 5** (5805) called other individuals (those listed in this affidavit and others) on approximately 208 occasions between approximately September 11, 2022 and October 11, 2022 using \*67.<sup>58</sup>

## 2. CANALE's Use of the Subject Texting Applications

138. CANALE has consented to multiple law enforcement reviews and data extractions of her cell phones. Those reviews demonstrate the repeated use of the texting applications discussed above on the CANALE Phones.<sup>59</sup>

139. More specifically, on October 4, 2021, CANALE consented to an extraction of her cell phone, CANALE Phone 2, which was completed by local police. The FBI was given a copy of the extraction. On November 17, 2021, CANALE consented to another extraction of her cell phone, CANALE Phone 2, which was completed by local police and, again, the FBI was given a copy of the extraction.

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<sup>58</sup> During an interview of CANALE on or about April 29, 2022, CANALE was questioned about \*67 calls made to Individuals, CANALE stated she called her boyfriend one time using no caller ID (\*67) when they were arguing, but "that's the only time [CANALE] did." CANALE was confronted with call detail records from multiple CANALE Phones showing \*67 calls made by CANALE Phones to other individuals. CANALE responded by blaming Individual D's hacking of CANALE Phones.

<sup>59</sup> In approximately August 2021, CANALE consented to a Private Investigator hired by the CANALE family conducting an extraction of her phone, which has not been provided to the FBI. On December 17, 2021, Individual A consented to local police conducting a second extraction of CANALE Phone 1. On December 21, 2021, the FBI was given a copy of this extraction.

140. According to local police, during their review of CANALE Phone 2 during the extraction process, the applications TextFree and Burner were not visible as downloaded applications, although they appeared in the data extraction as applications that had been accessed by CANALE Phone 2. Based on my training and experience, this is consistent with the applications having been deleted.

141. Based on the log entries in the data extraction and records provided by Pinger, CANALE Phone 2 accessed the application “TextFree” (also known as “TextFreeUltra” which is owned by Pinger) on multiple occasions within close proximity of account creation times for telephone numbers to send messages to Individuals.<sup>60</sup> According to the records for CANALE Phone 2:

a. On September 22, 2021 at 6:26:43 p.m. and 6:26:52 p.m., CANALE Phone 2 accessed the TextFree application. On the same date at 6:26:57 p.m., TextFree phone number 224-599-2261 was created and subsequently used to send messages to Individuals.

b. On September 23, 2021 at 8:20:08 p.m. and 8:20:15 p.m., CANALE Phone 2 accessed the TextFree application. On the same date at 8:20:25 p.m., Text Free phone number 630-733-1173 was created and subsequently used to send messages to Individuals.

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<sup>60</sup> Some account creation times do not have corresponding log entries in CANALE Phone 2. For example, on September 22, 2021 at 6:56:42 p.m., TextFree phone number 630-XXX-3244 was created and subsequently used to send messages to Individuals. Based on a consent extraction from CANALE Phone 2, there was no log entry related to TextFree on or about that time.

c. On September 24, 2021 at 4:50:49 p.m., CANALE Phone 2 accessed the TextFree application. On the same date at 4:51:25 p.m., TextFree phone number 630-326-8534 was created and subsequently used to send messages to Individuals.

d. On September 27, 2021 at 11:18:22 a.m. – 11:18:24 a.m., CANALE Phone 2 accessed the TextFree application. On the same date at 11:39:51 a.m., TextFree phone number 630-716-6411 was created and subsequently used to send messages to Individuals. On the same date at 11:39:55 a.m., CANALE Phone 2 accessed the TextFree application.

e. On September 28, 2021 at 7:59:33 p.m., 7:59:43 p.m. and 7:59:57 p.m., CANALE Phone 2 accessed the TextFree application. On the same date at 7:59:55 p.m., TextFree phone number 630-394-3658 was created and subsequently used to send messages to Individuals.

f. On September 28, 2021 at 10:10:28 p.m., TextFree phone number 224-603-2759 was created and subsequently used to send messages to Individuals. Based on a consent extraction from CANALE Phone 2, there was no log entry related to TextFree on or about that time.

g. On October 1, 2021 at 7:30:19 a.m., TextFree phone number 630-448-2908 was created and subsequently used to send messages to Individuals. On the same date at 7:34:57 a.m. and 7:52:34 a.m., CANALE Phone 2 accessed the TextFree application.



h. On October 3, 2021 at 2:51:39 p.m., TextFree phone number 224-599-5066 was created and subsequently used to send messages to individuals. On the same date at 2:52:43 p.m. and 3:04:06 p.m., CANALE Phone 2 accessed the TextFree application.

i. On October 3, 2021 at 5:39:28 p.m. to 5:39:31 p.m. and 5:39:46 p.m., CANALE Phone 2 accessed the TextFree application. On the same date at 5:39:42 p.m., Text Free phone number 630-394-3201 was created and subsequently used to send messages to Individuals.

j. On October 3, 2021 at 8:13:42 p.m., TextFree phone number 630-423-8003 was created and subsequently used to send messages to Individuals, according to local police. On the same date at 9:04:29 p.m., CANALE Phone 2 accessed the TextFree application. At 9:24:29 p.m., TextFree phone number 630-447-0445 was created and subsequently used to send messages to Individuals. Based on returns from Pinger, it appears TextFree numbers 8003 and 0445 were created by the same TextFree account.

142. CANALE's use of text-messaging applications has been confirmed by other means as well. During an interview of CANALE on April 19, 2022, CANALE gave consent for CANALE Phone 3 to be reviewed and searched. During an initial review of the device in CANALE's presence, agents reviewed CANALE's Google Play Store. CANALE's recent searches and the suggested applications can be seen in the images below. The recent searches included "textnow," "text apps," and "free text apps." The suggested applications included TextNow, Talkatone, and Burner,

amongst others, which are texting applications used to harass Individuals in this investigation.





143. Based on my experience, I believe suggested applications are catered to the user's previous application downloads. The free texting applications suggested on CANALE Phone 3's Google Play Store application can be indicative of the user of

CANALE Phone 3 searching for and/or downloading similar applications previously. Based on my experience, recent searches are queries run by the user of the device.<sup>61</sup>

### **3. False 911 Calls**

144. As part of the investigation, Individual A, B, and C have complained that, as part of the harassment they are experiencing, false 911 calls have been made, causing an unnecessary police response to their residence or, in Individual C's case, her place of employment. Generally, the 911 caller does not speak into the telephone, but calls and hangs up and on occasion texts 911 (as described below). Phone records and video evidence collected by the FBI indicate that CANALE has made multiple of these false 911 calls. For example:

a. *March 20, 2022:* According to local police reports, on or about March 20, 2022, responding officers were dispatched to CANALE's residence regarding a 911 hang-up phone call made by CANALE Phone 3. CANALE denied calling or texting 911. According to AT&T records for CANALE Phone 3, CANALE Phone 3 contacted 911 on March 20, 2022 at approximately 5:55 p.m., with multiple contacts to and from 911 until approximately 7:00 p.m.

b. *March 23, 2022:* According to local police reports, on or about March 23, 2022, responding officers were dispatched to CANALE's residence

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<sup>61</sup> During an April 29, 2022 interview of CANALE, CANALE was asked if CANALE used texting applications. CANALE stated "In high school I did, but I never used them while this was going on, no." CANALE was confronted with images of messages sent from the Burner texting application from a phone number registered to CANALE Phone 2, which she could not explain other than to blame alleged hacking by Individual D.



regarding a 911 hang-up phone call made by CANALE Phone 3. According to AT&T records for CANALE Phone 3, CANALE Phone 3 contacted 911 on March 23, 2022 at approximately 4:56 p.m., with multiple contacts to and from 911 until approximately 6:05 p.m.

c. *March 24, 2022:* According to local police reports, on or about March 24, 2022, responding officers were dispatched to CANALE's residence regarding text messages sent by CANALE Phone 3 to 911. Dispatch advised the responding officers the text messages said "2070 Mallow court" and the user of CANALE Phone 3 did not respond to text messages sent by dispatchers. CANALE denied calling or texting 911 and stated that there was no emergency to report. According to AT&T records for CANALE Phone 3, CANALE Phone 3 contacted 911 on March 24, 2022 at approximately 5:42 p.m., with multiple contacts to and from 911 until approximately 7:20 p.m.

d. *March 27, 2022:* According to local police reports, on or about March 27, 2022, responding officers were dispatched to CANALE's residence regarding a 911 call made from CANALE Phone 3 to 911. The caller did not speak, but later texted reporting a possible drug overdose was occurring within the CANALE residence.<sup>62</sup> According to AT&T records for CANALE Phone 3, CANALE Phone 3 contacted 911 on March 27, 2022 at approximately 1:04 p.m., with multiple contacts to and from 911 until approximately 1:29 p.m.

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<sup>62</sup> Responding officers reviewed CANALE Phone 3's call log and did not see any 911 calls in the call log.

e. *March 28, 2022:* According to a March 28, 2022 interview of CANALE, CANALE Phone 3 stopped working and on or about March 28, 2022, CANALE began using a Samsung Galaxy 03 device. According to an April 5, 2022 interview of Individual A, CANALE transferred the SIM card from CANALE Phone 3 to the Samsung Galaxy 03 device (CANALE Phone 4).

f. *April 8, 2022:* According to local police reports, on April 8, 2022, responding officers were dispatched to Individual B's residence for a possible domestic/suspicious incident. Dispatch received a text message from CANALE Phone 3 stating there was a domestic incident at Individual B's address. CANALE claimed Individual D is using CANALE Phone 4 to "swat" residences.<sup>63</sup> According to AT&T records for CANALE Phone 4, CANALE Phone 4 contacted 911 on April 8, 2022 at approximately 2:20 p.m., with multiple contacts to and from 911 until approximately 5:28 p.m.

g. *April 16, 2022:* According to local police reports, on or about April 16, 2022, responding officers were dispatched to the Subject Residence in response to text messages which said "Send Police" and "Family fighting."<sup>64</sup> The text was sent from CANALE Phone 4. According to the police report, no address was given by CANALE Phone 4 and dispatch instead utilized a Phase II number locator which indicated the call was coming from the CANALE's residence. According to local police,

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<sup>63</sup> "Swatting" is the action of making a prank call to emergency services in an attempt to bring police officers to a particular address.

<sup>64</sup> The government has requested records from AT&T for CANALE Phone 4 from April 16, 2022 but has not yet received the records.

the Phase II number locator geolocates the physical cell phone device's location and is not based on the phone number that calls 911.<sup>65</sup>

145. CANALE also made false 911 calls causing first responders to go to her former place of employment, Business A. For example:

a. *October 9, 2022:* According to local police reports, on or about October 9, 2022 at approximately 6:00 p.m., responding officers were dispatched to Business A in Hanover Park—where CANALE and Individual C worked—as a result of a 911 hang-up call. The caller sent text messages to dispatch claiming there was a domestic incident at Business A in Hanover Park. According to local police reports, the call and texts came from **CANALE Phone 5** (5805). According to Verizon records, **CANALE Phone 5** (5805) contacted 911 at approximately 5:55 p.m. and 5:58 p.m. on October 9, 2022.

b. *October 12, 2022:* According to local police reports, on October 12, 2022 at approximately 10:55 p.m., responding officers were dispatched to Individual B and Individual C's home in response to text messages claiming there was fighting and to send officers to Individual B and Individual C's address. The text was sent from **CANALE Phone 5** (5805). According to local police reports, dispatch geolocated the caller to the area of a park near Deforest Lane and Morton Road, approximately

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<sup>65</sup> During an interview of CANALE on or about April 29, 2022, CANALE was questioned about the 911 calls, CANALE stated “[Individual D] keeps calling 911.” CANALE stated “I never really called 911” and “The last time [CANALE] called 911 was in Florida when [Individual F] got hurt.” CANALE was confronted with call detail records from multiple CANALE phones detailing CANALE's contacts with 911. CANALE again stated “I don't call 911.”

one tenth of a mile from CANALE's residence. According to the police report, Individual B told responding officers the phone number that called 911 to their residence belongs to CANALE.

c. *October 19, 2022:* According to local police reports, on or about October 19, 2022 at approximately 3:48 p.m., responding officers were dispatched to Business A in Hanover Park for a 911 hang-up. According to the report, the caller texted dispatch claiming there was fighting at Business A in Hanover Park. According to the report, the call and texts came from **CANALE Phone 5** (8186). When officers responded to Business A, CANALE was not at work. At approximately 4:13 p.m., dispatch called **CANALE Phone 5** (8186). CANALE answered and claimed she had just arrived to Business A for her shift and was advised of the 911 call. CANALE claimed she had nothing on her phone to indicate that any calls were placed from **CANALE Phone 5** (8186) or any text messages from 911 were sent. According to Verizon records, **CANALE Phone 5** (8186) contacted 911 at approximately 3:46 p.m. and 3:47 p.m. on October 19, 2022.<sup>66</sup>

146. More specifically, according to local police reports, on October 16, 2022 at approximately 3:59 p.m., a 911 hang-up call was placed from telephone number

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<sup>66</sup> CANALE has previously claimed to the FBI that Individual D "spoofs" her phone number to call 911. According to experts consulted within the FBI, if an individual was "spoofing" CANALE's phone number to call or text 911, the contacts with 911 would not appear in CANALE's call detail records provided by phone companies such as Verizon and AT&T. According to experts consulted within the FBI, contacts with other phone numbers, including 911, which are listed on CANALE's call detail records are contacts and phone numbers dialed by the user of CANALE's device. In addition, as described below, video evidence shows CANALE appearing to place the false 911 calls.



630-682-5396 belonging to Business A in Hanover Park, Illinois. According to employee time logs received from Business A, CANALE was working on October 16, 2022.

147. On or about October 16, 2022, video surveillance was obtained from Business A.<sup>67</sup> In the below images from surveillance camera footage taken on October 16, 2022,<sup>68</sup> CANALE can be seen on the right and Individual C is on the left. Upon my review of the video footage, CANALE is seen looking at Individual C. Individual C has her back turned to CANALE. CANALE then picks up the phone. In the video footage, CANALE appears to press three digits. Based on my understanding of telephone keypads, I believe CANALE dialed “911”. Still images from the video footage I reviewed are provided below.

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<sup>67</sup> According to Business A’s IT employee, Business A computers at multiple locations contained an unknown malware as of October 2022. According to the IT employee, an individual would have needed access to the Business A computers at all locations where the malware was discovered. According to Business A records, CANALE, Individual C, and Individual E were only employed at one Business A location.

<sup>68</sup> According to FBI review of the video footage and local time as determined by a cell phone, timestamps on the images are accurate to the minute.













148. Similarly, according to local police reports, on October 18, 2022 at approximately 7:47 p.m., a 911 hang-up call was placed from telephone number 630-XXX-5396 belonging to Business A in Hanover Park. According to employee time logs received from Business A, CANALE was working on October 18, 2022.

149. On or about October 26, 2022, video surveillance was obtained from Business A. In the below images from surveillance camera footage taken on October 18, 2022<sup>69</sup>, CANALE can be seen on the right and Individual C is on the left next to an unknown individual. Upon my review of the video footage, Individual C has her back turned to CANALE when CANALE picks up the phone and hangs the phone back up. In the video footage, CANALE appears to pick up the phone a second time and press three digits. Given the location of those digits, I believe CANALE dialed “911”. Still images from the video footage I reviewed are provided below.

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<sup>69</sup> Timestamps on the images are approximate times.









150. According to an interview of the owner of Business A on or about November 8, 2022, local officers responded to Business A on or about November 4, 2022 in response to a 911 call. According to local police records, on or about November 4, 2022, at approximately 1:51 p.m., responding officers were dispatched to Business A after phone number 331-XXX-9408 texted 911 stating “[Business A] hanover park



need police.” Based on local police reports, FBI interviews, and AT&T records, phone number 331-XXX-9408 is owned by Individual A.<sup>70</sup>

#### **4. Facebook Profiles**

151. Facebook profiles used to harass Individual C and Individual D are also connected to CANALE, as described below.

##### **a. Facebook Profile 1**

152. As discussed above, Facebook Profile claimed to be a page by CANALE and Individual C as “prostitutes.” It also included a picture of the two of them. Based on my experience, Facebook requires users to verify either their email address or telephone number before permitting users access to accounts. According to returns from Facebook, CANALE Phone 3 was used to register and verify Facebook Profile 1 on April 18, 2022 at approximately 9:10 a.m. According to phone records for CANALE Phone 3, CANALE Phone 3 received a text message from Facebook on April 18, 2022 at approximately 9:10 a.m.

153. CANALE, however, claimed to investigators that she learned of Facebook Profile 1 through other means. During an April 19, 2022 interview, CANALE claimed to have received a screenshot of Facebook Profile 1 with Individual C’s name and

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<sup>70</sup> On or about November 16, 2022, CANALE’s private investigator emailed the FBI. According to the private investigator, CANALE said that CANALE’s manager, Manager A, at Business A, told CANALE to dismiss the business’s alarm by calling 911 in order to inform the dispatch center of the false alarm at the business. According to the private investigator, Manager A denied ever giving CANALE the order or suggestion to call 911 in order to inform the dispatch center of the false alarm at the business. In fact, Manager A stated to the FBI that he did not ever give this alleged instruction. Further, on or about November 17, 2022, Individual C was interviewed. Individual C stated the alarm at Business A only went off one time. Individual C was not given instructions when the alarm went off and never called 911 from Business A.

CANALE's name as the account name on or about April 18, 2022, at approximately 9:46 a.m. CANALE claimed Individual D sent the photo and that Individual D has previously posted the same photo seen in Facebook Profile 1 on Individual D's personal Facebook page.

154. CANALE claimed to the FBI to have received a text message from Facebook on or about April 18, 2022, which said CANALE's account was updated.<sup>71</sup> According to an April 21, 2022 interview of CANALE, CANALE claimed the first time she was made aware of Facebook Profile 1 was when she received the screenshot of Facebook Profile 1 on April 18, 2022, when it was sent to her. According to an April 29, 2022 interview of CANALE, CANALE claimed the first time she was made aware of Facebook Profile 1 was on April 17, 2022 when she saw the profile while she was on her own Facebook page.

155. However, according to a consent search of CANALE Phone 4, CANALE had a screenshot of Facebook Profile 1 saved in the images on her, phone. Metadata extracted from the photo lists the capture time as April 18, 2022 at approximately 9:40 a.m., approximately six minutes before CANALE received the photo via text message.<sup>72</sup> Further, according to a data extraction of CANALE Phone 4 pursuant to

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<sup>71</sup> CANALE also stated Individual C received the same message from Facebook.

<sup>72</sup> CANALE was confronted with Facebook records pertaining to Facebook Profile 1 and images taken from a consent extraction of CANALE Phone 4 with metadata from a screenshot of Facebook Profile 1, which she could not explain other than to blame alleged hacking by Individual D.

a search warrant, Facebook Profile 1 was logged as a User Account on CANALE Phone 4.<sup>73</sup>

**b. Facebook Profile 2**

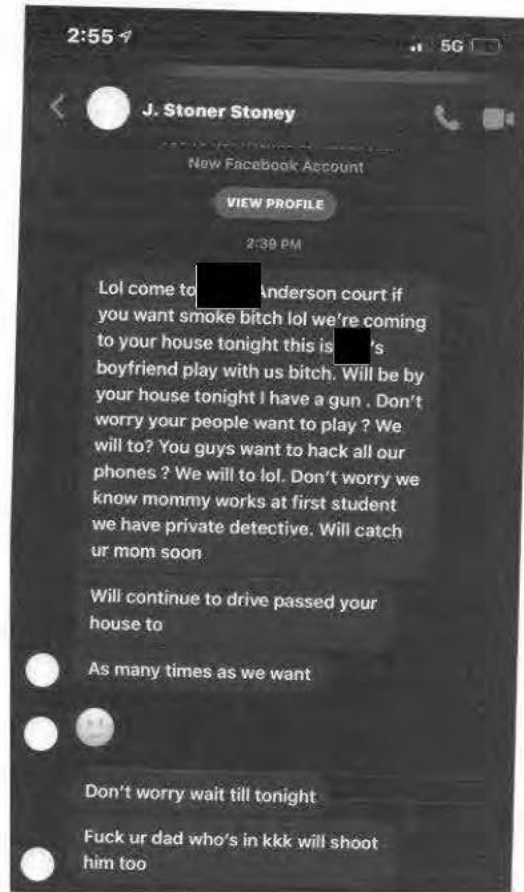
156. According to Individual E, on an undetermined date, Individual E received harassing messages through Facebook from a profile named “J. Stoner Stoney” (Facebook ID 100073929947111) (“Facebook Profile 2”). The user of Facebook Profile 2 sent messages which said “Will be by your house tonight I have a gun” and “Fuck ur dad who’s in kkk will shoot him too.” Images of the messages are below.

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<sup>73</sup> On or about April 20, 2022, a preservation request was made to Facebook for Facebook Profile 1. An extension request was submitted to Facebook, Facebook Profile 1 will be preserved by Facebook until approximately December 17, 2022.

Individual B and  
C's Address

Individual C



157. According to Facebook<sup>74</sup> records, Facebook Profile 2 was created on or about October 21, 2021 at 9:45 a.m. and was verified by CANALE Phone 2. According to T-Mobile returns for CANALE Phone 2, CANALE sent one message and received three messages from a phone number believed to belong to Facebook on October 21, 2022 at approximately 9:45 a.m. Further, according to Facebook records, Facebook Profile 2 was created with IP address 2607:fb90:a3c3:ee95:9c8c:dc21:52d0:3e44 on October 21, 2022 at approximately 9:45 a.m. According to T-Mobile records, IP

<sup>74</sup> Facebook is owned by Meta Platforms, Inc. For the purposes of this affidavit, Meta Platforms, Inc. is referred to by its former name, Facebook.



address 2607:fb90:a3c3:ee95:9c8c:dc21:52d0:3e44 was assigned to CANALE Phone 2 on October 21, 2022 at approximately 9:45 a.m.<sup>75</sup>

## **5. Statements to Investigators**

158. During the course of the investigation, CANALE and others close to her have told investigators that, among many other things, they believe their devices have been hacked, that Individual D has the ability to listen to their private conversations, that they have seen Individual D and others related to Individual D following them, and that the harassing messages are coming from Individual D. By way only of example, some of those claims are further summarized below:

a. As noted, CANALE and other Individuals have claimed their devices have been hacked by Individual D and/or others related to Individual D. According to CANALE's private investigator, a "bug sweep" was conducted at Individual A and Individual B's residences and no "bugs" were found.

According to Individual B, Individual B has seen Individual D in her yard holding a tablet while Individual A received unwanted messages in or about October 2021.

b. According to Individual A, a car that reportedly followed Individual A was discovered parked at Individual D's home. Individual A has also told investigators Individual A saw Individual E behind her residence.

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<sup>75</sup> On or about May 16, 2022, a preservation request was made to Facebook for Facebook Profile 2. An extension request was submitted to Facebook, Facebook Profile 2 will be preserved until approximately January 11, 2023.

c. CANALE and other Individuals believe Individual D is sending the messages due to the content of the harassing and threatening messages, such as spelling errors in the message reflecting spelling errors on Individual D's social media pages.

d. Representatives for CANALE arranged for her to participate in a polygraph examination, as did Individuals A, B, and C. The polygraph examiner questioned CANALE about the 2021 Florida trip and the incidents at Business A in Hanover Park. According to the polygraph examiner, CANALE passed the polygraph. According to an interview of the polygraph examiner, CANALE was not questioned about the messages CANALE and other individuals have received.

e. Agents also received a list of signed and notarized affidavits from Individual A, Individual C, and multiple individuals employed with CANALE at Business A. The affidavits contained statements from individuals who were in close proximity to CANALE when harassing messages or 911 hang-up calls were received and who do not believe CANALE could be sending harassing messages or calling 911.

f. According to documents provided by CANALE's private investigator, the private investigator arrived at Business A on or about October 16, 2022 at approximately 5:00 p.m. The private investigator stated he did not observe CANALE or Individual C make outbound phone calls or surreptitious movements.

159. Further, on or about November 16, 2022, an investigative narrative was provided to the FBI by CANALE's private investigator detailing the private investigator's findings and investigation. The narrative explains investigative efforts

made by the private investigator, including polygraph examinations for CANALE and Individual A, B, and C, surveillance at Business A, a potential “Integrity Relocation” of CANALE and Individual C, and the private investigator’s review of harassing messages and social media. The investigator concluded, among other things, that CANALE “showed no indications of deception” and she has “limited resources and limited connections” to commit the “cyberbullying,” that on October 6, 2022, he witnessed a “vehicle watching” CANALE’s house, and that the harassing messages “mirror the same verbiage” used on Individual D’s Facebook account.<sup>76</sup>

#### IV. PROCEDURES TO BE FOLLOWED IN SEARCHING ELECTRONIC STORAGE MEDIA

160. Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant will authorize the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol.

161. The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the following techniques (the following is a non-exclusive list, and the government may

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<sup>76</sup> According to the investigator’s report, these alleged similarities between the subject messages and text on Individual D’s Facebook account include, but are not limited to, discussions of “karma,” misspellings, and onomatopoeic representations of laughter such as “Bwahaaaa” (on Individual D’s Facebook account) and, for example, “Bahhhahaha” and “Haahahahaha” (in the subject messages). To the extent there are similarities between Individual D’s social-media posts and the subject messages, I believe they may reflect CANALE’s attempt to mirror Individual D in a further attempt to place blame on Individual D for the **Subject Offense**.

use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B;

d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

162. The government will return any electronic storage media removed from the premises described in Attachment A within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the



removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

## V. CONCLUSION

163. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, beginning on or about November 2021 through October 2022, SABRINA CANALE, did commit the **Subject Offense**. Furthermore, based on the foregoing facts, I submit that there is probable cause that the **Subject Offense** has been committed, and that a search of **CANALE Phone 5** will reveal evidence and instrumentalities of the **Subject Offense**.

FURTHER AFFIANT SAYETH NOT.

*Nina D. Miller* w/p TPP

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NINA D. MILLER  
Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN before me via telephone on December 7th, 2022.

*Sheila Finnegan*  
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Honorable Sheila M. Finnegan  
United States Magistrate Judge